

Exhibit 1

Plaintiffs' Corrected Averment of Jurisdictional Facts and Evidence
and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

1	UNITED STATES DISTRICT COURT	
2	SOUTHERN DISTRICT OF NEW YORK	
3	IN RE: TERRORIST ATTACKS ON)
4	SEPTEMBER 11, 2001)
5	<hr/>)
6	Underwriting Members of Lloyd's)
7	Syndicate 2, et al., v.)
8	Al Rajhi Bank, et al.,) 03 MDL 1570
9	No. 16-cv-07853) (GBD) (SN)
10)
11	Addesso, et al. v. Kingdom of) ECF Case
12	Saudi Arabia, et al.,)
13	No. 16-cv-09937)
14)
15	Aguilar, et al. v. Kingdom of)
16	Saudi Arabia, et al.,)
17	No. 16-cv-09663)
18)
19	Hodges, et al. v. Kingdom of)
20	Saudi Arabia, et al.,)
21	No. 17-cv-00117)
22)
23	Aiken, et al. v. Kingdom of)
24	Saudi Arabia, et al.,)
25	No. 17-cv-00450)
)
	Charter Oak Fire Insurance Co.,)
	et al. v. Al Rajhi Bank, et)
	al., No. 17-cv-02651)
)
	Abarca, et al. v. Kingdom of)
	Saudi Arabia, et al.,)
	No. 17-cv-03887)
)
	Arrowood Indemnity Co., et al.)
	v. Kingdom of Saudi Arabia, et)
	al., No. 17-cv-03908)
)
	Abedhajajreh, et al. v. Kingdom)
	of Saudi Arabia, et al.,)
	No. 17-cv-06123)
)
	Muenchener)
	Rueckversicherungs-Gesellschaft)
	Aktiengesellschaft in Muenchen,)
	et al. v. Kingdom of Saudi)
	Arabia, et al.,)
	Case No. 17-cv-07914)

1 Abbate, et al. v. Kingdom of)
Saudi Arabia, et al.,)
2 No. 17-cv-08617)
3

4 WEDNESDAY, SEPTEMBER 27, 2023

5 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

6 - - -

7 Remote videotaped deposition of
8 Abdullah bin Sulaiman Al Rajhi, held at the
9 location of the witness in Saudi Arabia,
10 commencing at 2:37 p.m. Arabia Standard Time,
11 on the above date, before Carrie A. Campbell,
12 Registered Diplomat Reporter, Certified
13 Realtime Reporter, Illinois, California &
14 Texas Certified Shorthand Reporter, Missouri,
15 Kansas, Louisiana & New Jersey Certified
16 Court Reporter.

17 - - -
18

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19 ABDULRAHMAN AL MUSSAED, foreign
20 litigation department, Al Rajhi Bank
21 AHMED HAROON, interpreter
22 MARWAN ABDEL-RAHMAN, interpreter
23 RODINA MIKHAIL, interpreter

24 TRIAL TECHNICIAN:

25 JON KNOWLES, Precision Trial Services

VIDEOGRAPHER:

JEFF FLEMING,
Golkow Litigation Services

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1 VIDEOGRAPHER: We are now on
2 the record. My name is Jeff Fleming.
3 I'm a videographer for Golkow
4 Litigation Services.

5 Today's date is September 27,
6 2023. The time in Riyadh, Saudi
7 Arabia, is 2:37 p.m.

8 This remote video deposition is
9 being held in the matter of Terrorist
10 Attacks on September 11, 2001, MDL
11 Number 1570.

12 The deponent is Abdullah al
13 Rajhi.

14 All parties to this deposition
15 have agreed to the witness being sworn
16 in remotely.

17 Due to the nature of remote
18 reporting, please pause briefly before
19 speaking to ensure all parties are
20 heard completely.

21 Counsel please state your
22 appearances after which our court
23 reporter, Carrie Campbell, will swear
24 in the witness.

25 MR. CARTER: Sean Carter and

1 Scott Tarbutton from Cozen O'Connor on
2 behalf of the plaintiffs.

3 MR. CURRAN: Anyone else on the
4 plaintiff side?

5 MR. SHEPS: Robert Sheps from
6 the Sheps Law Group, plaintiffs.

7 MR. CURRAN: Okay. If that's
8 all on the plaintiff side, I'll go
9 next. This is Christopher Curran of
10 White & Case on behalf of Al Rajhi
11 Bank and the witness.

12 I am accompanied in the room by
13 my colleague Nicole Erb, Reuben
14 Sequeira, Anwar Akrouk, and I have a
15 colleague, Michael Mahaffey, who is
16 appearing virtually.

17 We also have in the room two
18 members of the Al Rajhi Bank legal
19 department, the general counsel,
20 Thamer Alhumud and Abdulrahman Al
21 Mussaed.

22 We also have present in the
23 room a check interpreter by the name
24 of Ahmed Haroon, H-a-r-o-o-n.

25 And I do want to say at the

1 outset that I'm confident that this
2 deposition will elicit confidential
3 information of Al Rajhi Bank and
4 perhaps its customers and I,
5 therefore, provisionally designate the
6 deposition as confidential in
7 accordance with the protective order,
8 certainly for the initial 30 days and
9 then thereafter.

10 So I'll ask that other defense
11 counsel identify themselves. And I
12 also do want to confirm that only
13 people who are covered by the
14 protective order are on this video
15 call. So if anyone is not covered by
16 the protective order, I ask that they
17 identify themselves and then I will
18 ask them not to participate.

19 So --

20 MR. CARTER: And, Chris, if you
21 can clarify, you're referring to the
22 omnibus protective order, correct?

23 MR. CURRAN: I am, yes.

24 MR. HAEFELE: Chris, this is
25 Robert Haefele from Motley Rice. I

1 didn't unmute myself. I'm appearing
2 for plaintiffs, but Robert Haefele
3 from Motley Rice is here as well, and
4 I am covered by the omnibus protective
5 order.

6 MR. CURRAN: Very good. Thank
7 you very much.

8 All right. Other defense
9 counsel?

10 MR. SHEN: This is Andy Shen
11 from Kellogg Hansen for The Kingdom of
12 Saudi Arabia.

13 MS. KHATIB: Sumayya Khatib
14 from Lewis Baach Kaufmann Middlemiss
15 for MWL and the former charity
16 defendants.

17 MR. COTTREAU: Good morning.
18 It's Steve Cottreau and Gabby Pritsker
19 from Jones Day for Dubai Islamic bank.

20 MR. MOHAMMEDI: Good morning.
21 This is Omar Mohammedi from OTM Law on
22 behalf of World Assembly of Muslim
23 Youth.

24 MR. NDANUSA: Good morning.
25 This is Mustapha Ndanusa from OTM Law

1 Firm, also on behalf of World Assembly
2 of Muslim Youth.

3 MR. CURRAN: Okay. If there's
4 no one else, I think that takes care
5 of the appearances. And I take from
6 the silence that no one is not covered
7 by the protective order.

8 So over to you, Mr. Carter.

9 MR. CARTER: Sure. Have we
10 sworn in the witness?

11
12 ABDULLAH BIN SULAIMAN AL RAJHI,
13 of lawful age, having been first duly sworn
14 to tell the truth, the whole truth and
15 nothing but the truth, deposes and says on
16 behalf of the Plaintiffs, as follows:

17

18 DIRECT EXAMINATION

19 QUESTIONS BY MR. CARTER:

20 Q. Good morning, Mr. Al Rajhi. I
21 should say better, since you're in Riyadh,
22 good afternoon.

23 A. Yeah. Well, good morning,
24 Mr. Carter, on your time.

25 Q. Thank you.

1 My name is Sean Carter. I'm an
2 attorney with the law firm of Cozen O'Connor,
3 and I represent plaintiffs in this litigation
4 arising from the September 11th attacks.

5 We're here today to take your
6 testimony relating to issues relevant to that
7 litigation pursuant to a court order.

8 You understand that you are
9 under oath today?

10 A. Yes, I do understand.

11 Q. And you understand that the
12 conduct of this testimony would be the same
13 as though it's proceeding in a court of law
14 before a judge, correct?

15 A. Yes.

16 Q. And you also understand that
17 you're required to be truthful in all of your
18 answers and forthcoming and to provide all
19 information available to you that's
20 responsive to my questions?

21 MR. CURRAN: Objection.

22 Overbroad.

23 You may answer.

24 THE WITNESS: Yes, I do.

25

1 QUESTIONS BY MR. CARTER:

2 Q. Mr. Al Rajhi, have you ever
3 given testimony in a court proceeding before?

4 A. No, I didn't. This is the
5 first time.

6 Q. And have you ever given a
7 deposition of any kind before?

8 A. No, I didn't.

9 Q. Just so that we proceed as
10 efficiently as possible, I'm going to lay out
11 a few ground rules for our conversation
12 today.

13 The first is that the court
14 reporter will be taking down your testimony
15 for purposes of creating a transcript of our
16 dialogue. And it is difficult for her to
17 maintain an accurate transcript if we're
18 talking over one another. So it is important
19 for you to wait for me to complete my
20 questions before you begin to answer, and I
21 will try to do the same courtesy and wait
22 until you've finished your answer before
23 asking you another question.

24 Is that understandable?

25 A. Yes, it is understandable.

1 Q. And the court reporter also
2 cannot take down any gestures or nods of the
3 head, so it's necessary for you to be sure to
4 verbalize all of your answers.

5 Do you understand that?

6 A. Yes.

7 Q. And if at any point you need to
8 take a break, that's absolutely fine. You
9 just need to let us know.

10 Okay?

11 A. Okay. I understand.

12 Q. And I understand from the
13 dialogue with counsel that you'll be
14 attempting to testify in English today.

15 Do you regard yourself to be a
16 fluent English speaker?

17 A. No, I cannot consider myself
18 fluent, but I will do my best to say it in
19 English.

20 Q. Do you at times carry out
21 business activities in English, whether in
22 writing or verbally, at meetings?

23 A. Yes, I do sometimes. Yes.

24 Q. And do you have any formal
25 English language education?

1 A. I -- yes, I did some in the
2 United States and in the UK.

3 Q. And where in the United States
4 did you study English?

5 A. It was somewhere in
6 Philadelphia.

7 Q. And where in Philadelphia?

8 A. In a Philadelphia university,
9 Wharton School. Philadelphia university.

10 Q. It's a wonderful city, and
11 happens to be where I'm sitting right now.

12 A. It is. Okay.

13 Q. So --

14 A. I spent -- a spent about four
15 months there.

16 Q. Okay. Have you spent any other
17 time studying in the United States besides
18 the four months in Philadelphia?

19 A. Well, I came many years
20 after -- to Wharton School and did some
21 management courses, two courses, in
22 Philadelphia and with Wharton School.

23 Q. And that's at the University of
24 Pennsylvania, correct?

25 A. Yes, it is.

1 Q. We'll get into further details
2 of your background in a minute.

3 Can you tell me, are you
4 currently employed with Al Rajhi Bank?

5 A. I am now the chairman of the
6 board.

7 Q. And in your role as chairman of
8 the board of the bank at a very high level,
9 what are -- what are your responsibilities?

10 A. My responsibility with the
11 board that we supervise the bank's operation,
12 policies, procedures, the total bank
13 operation.

14 Q. And would you agree that it's
15 the responsibility of the board to advance
16 and protect the interests of the bank?

17 A. Yes. Yes, that's also a
18 responsibility.

19 Q. And aside from your role as
20 chairman of the board, do you hold any
21 positions currently at Al Rajhi Bank?

22 A. No, I am only the chairman of
23 the board and -- and the board we have the
24 five committees - executive committees, audit
25 committee, risk committee, governance

1 committee, what you call it, nomination
2 committee. And I am only chairman of the
3 board and chairman of the executive
4 committee.

5 Q. And does your role as chairman
6 of the board and chairman of the executive
7 committee involve day-to-day work on behalf
8 of the bank?

9 A. No, it's not the day-to-day
10 work. It's overall regular board. So it's
11 not day to day.

12 Q. Are you aware that the present
13 lawsuit involves claims for billions of
14 dollars in property damage and thousands of
15 personal injuries related to the
16 September 11th attacks?

17 A. Yes, I know this is the case.

18 Q. And are you also aware that the
19 plaintiffs in this case are suing Al Rajhi
20 Bank for those injuries and have alleged that
21 the bank aided and abetted al-Qaeda and the
22 attacks by, among other things, providing
23 financial services to entities and persons
24 associated with al-Qaeda?

25 A. Yes, I understand this is their

1 claim.

2 Q. And I take it that the bank
3 views those charges as serious?

4 A. Yes, of course we are. This is
5 why I'm here today. We take it very serious.

6 Q. Well, in fact, you're here
7 today because the judge overseeing the case
8 required you to be here. The fact is that
9 the bank objected to your appearance to
10 testify, correct?

11 MR. CURRAN: Objection as to
12 form.

13 You may answer.

14 THE WITNESS: Yes, I hear you,
15 but as I said, you know, I know about
16 the case and we are taking it serious.

17 QUESTIONS BY MR. CARTER:

18 Q. And would you agree that an
19 adverse outcome of this lawsuit against the
20 bank could damage the bank financially?

21 A. Yes. I mean, I understand the
22 bank has -- have any allegation to the bank.

23 Q. And do you also agree that the
24 development of derogatory bank -- derogatory
25 information about the bank's relationships

1 with parties involved in supporting al-Qaeda
2 could cause reputational harm to the bank?

3 MR. CURRAN: Objection as to
4 form. Lack of foundation.

5 You may answer.

6 THE WITNESS: So can you ask
7 the question again?

8 QUESTIONS BY MR. CARTER:

9 Q. Would you -- would you agree
10 that litigation of this nature alleging that
11 the bank was involved in aiding and abetting
12 al-Qaeda has the potential to result in
13 reputational harm to the bank?

14 A. Yes. Yes, I do.

15 Q. And in your role as chairman of
16 the board, you have an interest in protecting
17 the bank's financial condition and its
18 reputation, correct?

19 MR. CURRAN: Objection as to
20 form.

21 You may answer.

22 THE WITNESS: Yes.

23 QUESTIONS BY MR. CARTER:

24 Q. And Mr. Curran noted at the
25 outset of the deposition that he was

1 provisionally designating the transcript of
2 your testimony today as confidential.

3 Did you hear that exchange?

4 A. Yes, I hear it.

5 Q. And are you aware that at least
6 during the discovery phase of the case, the
7 designation of your testimony as confidential
8 means that it would not be available to the
9 public in relation to any court filings?

10 MR. CURRAN: Objection as to
11 form.

12 You may answer.

13 THE WITNESS: Yes, I do.

14 QUESTIONS BY MR. CARTER:

15 Q. And are you aware that Al Rajhi
16 Bank has designated every document it has
17 produced in this litigation as confidential?

18 MR. CURRAN: Objection as to
19 form.

20 You may answer.

21 THE WITNESS: Yes.

22 QUESTIONS BY MR. CARTER:

23 Q. And did the bank do that in
24 part to ensure that that information would
25 not be publicly available?

1 MR. CURRAN: Objection as to
2 form. Instruct the witness not to
3 answer if it requires disclosing
4 attorney-client communication.

5 But you may answer.

6 THE WITNESS: Sorry, can you
7 ask again, please?

8 QUESTIONS BY MR. CARTER:

9 Q. Were you involved at all in the
10 decision to designate all of the documents
11 produced by Al Rajhi Bank in discovery as
12 confidential?

13 A. No, I was not involved.

14 Q. And were you informed about
15 that decision by people at Al Rajhi Bank?

16 A. Yes, I have been informed.

17 Q. And are you aware that the
18 result of that designation is that at least
19 during the discovery phase, it means that
20 there is no public access to any of the
21 information Al Rajhi Bank has produced?

22 A. Yes.

23 MR. CURRAN: Objection. Lack
24 of foundation.

25 You can challenge those

1 designations, Mr. Carter.

2 The witness can answer.

3 THE WITNESS: Yes, sir.

4 QUESTIONS BY MR. CARTER:

5 Q. And at least thus far -- the
6 result means that thus far the public has not
7 had access to any evidence produced by Al
8 Rajhi Bank that's been submitted to the
9 court.

10 Are you aware of that?

11 A. Yes, I am aware.

12 Q. Am I correct that Al Rajhi Bank
13 was founded by, among others, your father,
14 Sulaiman Abdul Aziz Al Rajhi?

15 A. Yes. There's three brothers.

16 Q. I am sorry, could you repeat
17 that, Mr. Al Rajhi?

18 A. Yes. He formed it with other
19 his other three brothers.

20 Q. Which three brothers were
21 involved in forming Al Rajhi Bank with
22 Sulaiman al Rajhi?

23 A. It was Saleh Abdulaziz Al Rajhi
24 and Abdullah Abdulaziz Al Rajhi and Mohammed
25 Abdulaziz Al Rajhi.

1 Q. And do you know whether those
2 four brothers were also involved in forming a
3 foundation to carry out charity work?

4 A. No, I didn't recall it, but
5 could be in early '80s, maybe the '80s. They
6 were, you know, doing charity together, but I
7 don't recall it.

8 Q. Are you aware that plaintiffs
9 in this lawsuit have alleged that your father
10 Sulaiman Abdul Aziz Al Rajhi had a long-time
11 involvement in supporting extremists?

12 A. I understand this is their
13 allegation.

14 Q. And as Sulaiman Abdul Aziz Al
15 Rajhi's son, am I correct that you have an
16 interest in defending his reputation?

17 MR. CURRAN: Objection as to
18 form.

19 You may answer.

20 THE WITNESS: Yes. Yes, I have
21 an interest in protecting his
22 reputation in the bank.

23 QUESTIONS BY MR. CARTER:

24 Q. Just for a minute, can you give
25 me a sketch of your educational background?

1 A. Yes, sure.

2 I graduated from King Abdulaziz
3 University in Jeddah, and my study was in
4 business administration. This goes to 1979.

5 And so this is the -- and after
6 that I have done some management training. I
7 mentioned before, you know, the two I had in
8 the Wharton School in Philadelphia, also
9 there was others, respected schools in UK and
10 Switzerland.

11 Q. You mentioned a 1979 date for
12 your study at King Abdulaziz University.

13 Is that the year you graduated?

14 A. This is the year I graduated,
15 yes.

16 Q. And do you recall the time
17 frame of your study at Wharton School in
18 Pennsylvania?

19 A. No, I don't, but this -- I
20 would assume it was -- could be early '90s.

21 Q. And did you receive any degrees
22 as a result of your studies at Wharton?

23 A. No, no, it was courses. I had
24 some certificate courses. And also, just to
25 make sure that I did not miss some things

1 about my education. Also I had -- actually
2 this was very useful training for me with
3 Citibank in Greece, we had also ten weeks
4 training. That was early '80s. It was a --

5 Q. What was the focus of training
6 at Citibank for those ten weeks?

7 A. It was banking, all banking.
8 It's about operation, credit, IT. At that
9 time IT was transforming and was an important
10 subject. It was a -- tens of weeks, and
11 actually this was one of the best courses I
12 has attended.

13 Q. And that was in the 1980s?

14 A. That's what I would expect,
15 yeah. Maybe '82 or '80 -- yeah, and then --
16 in the early '80s. I'm not sure about which
17 year was it.

18 Q. All right. You mentioned as
19 well some studies in the UK and Switzerland.

20 Do you remember what schools
21 those were at and the time frame?

22 A. The time frame, no, I don't
23 remember because -- but all before 2000, but
24 I don't remember, you know, which years.

25 And Switzerland was IMD, very

1 respected university, having, you know,
2 training courses.

3 I don't now remember the one in
4 the UK, but, again, it's a -- it's a
5 respected university there, well-known for
6 good training programs.

7 Q. And what were the -- what was
8 the focus of the training at IMD in
9 Switzerland?

10 A. It was about strategy, you
11 know, business strategy, forming business
12 strategy. And of course discussing -- it
13 was, you know, a lot of sharing experience
14 with other executive and how -- you know, how
15 their experience and how the different
16 strategy they have formed and the challenge.

17 So it was very useful, you
18 know, to share information about -- about,
19 you know, how you form. And at that time
20 also for me it was very important, which is
21 help deciding about Al Rajhi Bank, how we set
22 up our strategy and moving, you know, with --
23 with the change in -- the banking industry
24 was changing at that time.

25 Q. And with regard to the studies

1 in the UK, I know you said you don't remember
2 the institution where you studied, but do you
3 recall the nature of the coursework?

4 A. Yeah, it was, again, about
5 marketing, different subject, marketing,
6 convincing, you know, your staff, you know,
7 it's about people, managing your people,
8 supervising, you know, your people. So it's
9 different -- it's all about management.

10 And again, it's the same thing
11 at the -- it's really you're there for what
12 you've been -- the cases you show they're
13 risky but also you get a lot from sharing
14 your experience with the others about, you
15 know, what they are -- you know, what they
16 are doing and that's also, you know, many
17 cases could be as useful as also what you
18 learn from the cases you go for -- with the
19 professors.

20 Q. And based on your background in
21 banking, are you familiar with the term
22 "anti-money laundering"?

23 A. Yes, I'm familiar with it.

24 Q. And sometimes the acronym AML
25 is used to refer to anti-money laundering.

1 Are you familiar with that?

2 A. Yes.

3 Q. And are you familiar with the
4 concept of counterterrorism financing?

5 A. Yes, I am.

6 Q. And in some cases I've seen the
7 acronym CTF used to refer to counterterrorism
8 financing.

9 Are you familiar with that
10 usage?

11 A. CTF, in our system, the bank
12 system?

13 Q. No, I'm asking generally if the
14 acronym CTF is familiar to you as a way to
15 refer to counterterrorism financing?

16 A. No, not -- not -- not
17 specifically, but -- about this CTF.

18 Q. Do you have any formal training
19 in anti-money laundering or counterterrorism
20 financing?

21 MR. CURRAN: Objection. Vague.

22 You may answer.

23 THE WITNESS: Yeah, we -- not
24 the training, by going to training
25 school, but we make sure from that

1 time, and even today, that in the
2 board we bring a third party to
3 present to the board what the board
4 should know about the support or
5 this -- or money laundering. And so
6 we did this in training from time to
7 time. Most likely, third party comes
8 in and give a training for the whole
9 board.

10 QUESTIONS BY MR. CARTER:

11 Q. And in your work with Al Rajhi
12 Bank, have you ever had any responsibility
13 for the bank's anti-money laundering
14 activities?

15 A. No, I was -- you know, I was
16 indirectly responsible, but not direct
17 responsibility.

18 Q. When you say "indirectly
19 responsible," what do you mean?

20 A. I mean, for example, today and
21 that was -- you know, almost what I recall
22 from all of that time before. As a general
23 manager when there was a general manager or
24 when I was also CEO of the bank, and even now
25 as I sit on the board, you will have, for

1 example -- maybe it's easier like today I
2 explain.

3 Today, you know, we have a
4 board member of 11 people and, you know, we
5 have -- actually, when I say 11, four or five
6 of these board members are independent.
7 Because, you know, we as a bank, we're not
8 only following our company law, but also
9 we under -- we are under two supervision. As
10 a listed company, we are under Capital Market
11 Authority supervision, and as a bank under
12 the Central Bank's supervision.

13 And then we have -- then we
14 have to make sure that we comply with all
15 these regulatory requirements.

16 So we are -- always have four
17 to five of the board members are independent
18 board members. And we have number of
19 committees. I think I mentioned before we
20 have about five committees. And now under
21 the board, we have the audit committee and
22 that audit committee oversee the -- oversee
23 the governance -- the head of governance,
24 which is a senior executive position in the
25 bank.

1 Q. And, Mr. Al Rajhi, what you
2 just described in terms of the structure of
3 the bank and its committees and oversight and
4 the auditing function relates to the current
5 status of the bank, correct?

6 A. Yes, this is -- now, well, no,
7 this was from the beginning, but now I am the
8 chairman. At the time I was not on the
9 board, so I was -- but -- but this is, you
10 know -- having independent board members and
11 having these committees -- okay, maybe today
12 we have one more committee. For example, you
13 know, we have, I think, a long time also an
14 interview committee, which, again, it's not
15 required by both regulator, but I think as a
16 bank a good practice because we are --
17 actually from time to time we hire
18 third-party class consultant to help us in
19 making sure that we did the right governance,
20 we do the right analysis. And I remember on
21 one of -- one of the consultant's
22 recommendation as a business practice, even
23 it's not being required by both regulator to
24 have what you call it governance committee.
25 At this governance committee, it's not the

1 usual governance committee you see to the --
2 but actually this -- it is from the board.
3 So board member, the board member sitting --
4 sitting this and their job to make sure that
5 the company is the doing the compliance.

6 But going back to your
7 question, the audit committee and supervising
8 the governance, it was always the case.

9 Q. Okay. And one additional
10 ground rule for today, Mr. Al Rajhi, that I
11 neglected. We have a limited amount of time,
12 and so it would be helpful if you try to
13 focus your answers to the particular question
14 I ask, and I appreciate the interest in being
15 helpful where you can, but we want to use our
16 time as efficiently as possible.

17 Is that okay?

18 MR. CURRAN: Mr. -- no,
19 Mr. Carter, you instructed him to be
20 forthcoming fully. I remember
21 specifically your instruction to the
22 witness. He's trying to be
23 cooperative with you.

24 So, please, settle --

25 MR. CARTER: I acknowledged his

1 effort, Chris, to be forthcoming, and
2 I just asked him to focus a little bit
3 more closely on the particular
4 question I had asked. So --

5 THE WITNESS: No, but,
6 Mr. Carter, actually, you know, I
7 wanted -- because you asked me if this
8 is the case today, I just wanted to
9 explain, you know, that's -- you know,
10 that was the purpose of --

11 QUESTIONS BY MR. CARTER:

12 Q. Okay.

13 A. I thought this was the
14 question.

15 Q. During the period of 1998
16 through 2002, were you employed with the
17 bank?

18 A. Yes, I was.

19 Q. And was there -- were there
20 people at the bank who were responsible for
21 day-to-day compliance with the bank's
22 anti-money laundering obligations?

23 A. Yes, there was people. Yes.
24 Sure.

25 Q. Do you recall how many people

1 worked in that function in 1998 to 2002 time
2 period?

3 A. Oh, no. This is, oh, what,
4 maybe more than 20 -- no, I don't remember
5 the number today.

6 Q. And during the -- during the
7 1998 to 2002 time period, what positions did
8 you hold with the bank?

9 A. I was from -- from '90 -- from
10 '90 -- 1996, I was the general -- I mean, at
11 this period I was the general manager.

12 Q. And what is the function of the
13 general manager?

14 A. The general manager was --
15 oversee day to day the operation of the bank,
16 and I used to report to the managing
17 director. And of course to the board.

18 Q. Who was the managing director
19 during that time period?

20 A. At that time my father was the
21 managing director.

22 Q. And so you were -- you reported
23 directly to your father, Sulaiman bin
24 Abdulaziz Al Rajhi during that period?

25 A. Yes, right.

1 Q. And you reported as well to the
2 board during that time period?

3 A. I was also board member, so
4 attending the board's meetings.

5 Q. Did you report to anyone else?

6 A. No.

7 Q. And as general manager, were
8 you responsible for the overall oversight of
9 day-to-day activities of the entire bank?

10 A. Yes, the board over -- you
11 know, the board is the ultimate -- oversee
12 the whole bank, but in day to day, I was
13 managing the bank.

14 Q. And --

15 A. Of course -- sorry.

16 Q. Sorry.

17 In that function, did the
18 people who were responsible for the bank's
19 anti-money laundering compliance report to
20 you?

21 MR. CURRAN: Objection. Vague.

22 You may answer.

23 THE WITNESS: So what was the
24 question?

25

1 QUESTIONS BY MR. CARTER:

2 Q. In that time period, given your
3 role as general manager, did the people who
4 were responsible for the bank's anti-money
5 laundering compliance report to you?

6 A. Yes, they could report -- they
7 have -- again, I can't recall, you know,
8 exactly how it -- you know, how it worked
9 year by year, but most likely, they have
10 the -- you know, they report to the audit
11 committee and to me.

12 Q. And so there was an audit
13 committee in place during the 1998 to 2002
14 time period?

15 A. Yes, sure. From the beginning
16 of the bank was always audit committee.

17 Q. And was the audit committee
18 responsible for the bank's anti-money
19 laundering compliance?

20 A. Well, the audit committee is
21 responsible for the compliance of the bank
22 and oversee the -- the -- you know, how --
23 they oversee the total compliance. And by --
24 and also I need to clarify, you know, the
25 audit committee in the bank, we always have

1 five -- when I say always, this is what I
2 remember for many, many years, and I cannot
3 confirm, but I think my understanding was
4 always like this.

5 And it has five -- who from the
6 audit committee are board members and the
7 three are independent. So, again, here
8 based on that, you know, the majority of the
9 audit committee are independent audit
10 committee members.

11 Q. When did you first join Al
12 Rajhi Bank as an employee?

13 A. As -- when I graduated. I
14 mentioned '79 when I graduate, I started
15 working.

16 At that time of course it was
17 not the bank. It was the family money
18 exchange company before. So I -- I joined,
19 which is later, you know, became the bank,
20 coming in the bank.

21 So '79 to answer the question.

22 Q. And when did the family money
23 exchange company transform into the bank?

24 A. In 19 -- the dates, it was --
25 it was in 1988.

1 Q. And when the bank was first
2 formed in 1988, was it a publicly listed
3 entity?

4 A. Yes, it was, from the
5 beginning, yes, from 1988.

6 Q. And before that, was it a
7 family-held entity?

8 A. It was -- yes, it was owned by
9 the four brothers.

10 Q. And when the bank was formed in
11 1988, were the four brothers the largest
12 shareholders?

13 A. They were -- no, before --
14 before -- before 1988, the four brothers,
15 they were all on the bank board, on the
16 company board, exchange company board.

17 And if I'm not mistaken, again,
18 I cannot be specific here because things
19 changed, but -- but two of them -- at least
20 one of them, my father, was also the general
21 manager of -- of the exchange company.

22 And if I'm not mistaken, one of
23 his other brothers also -- I know he was
24 there, but I cannot say for sure for the
25 whole period, he was also working in the bank

1 taking some other responsibility of our
2 construction projects and other things.

3 Q. Which brother was that?

4 A. Mohammed.

5 Q. And what about the two other
6 brothers you mentioned?

7 I think you said Saleh was
8 involved in the formation of the bank. Did
9 he have any role with the bank after 1988?

10 A. After 1988, yes, he was -- he
11 was actually the chairman when it was
12 exchange company, and he was the chairman
13 after -- you know, when the company started
14 first. When the bank -- sorry, when '88 the
15 bank started. So he was the chairman.

16 Q. And do you recall how long he
17 continued to be involved with the bank?

18 A. He was the chairman of the bank
19 until my father became chairman, which is, I
20 think -- I think it was -- I'm not sure.
21 Maybe -- maybe end of '90s.

22 But he was -- he was the
23 chairman until my father became the chairman,
24 which is, I think, maybe -- maybe until the
25 end of '90s maybe or -- early, early 2000. I

1 can't really remember the date.

2 Q. And how long did your father
3 serve as chairman of the bank?

4 A. He chair -- he was the chairman
5 until 2014, which is, I think maybe about --
6 yeah, now, maybe -- maybe now I can be more
7 correct because I know that about 15 years.

8 So I would expect, again, I
9 didn't want to confirm -- the dates anyhow is
10 available on the website of the bank, if I'm
11 not mistaken, at least years before when my
12 father was the chairman.

13 But I think maybe -- maybe '99,
14 '99 he started. Because he left 2000 -- he
15 left as a chairman 2014, and I know when he
16 left, he served about 15 years. So it must
17 be -- it must be 1999 started.

18 Q. And has your father Sulaiman
19 Abdul Aziz Al Rajhi had any role with the
20 bank since stepping away as chairman in 2014?

21 A. No, he doesn't have any role in
22 the bank.

23 Q. And from the time you joined
24 the bank in 1979, can you tell me what
25 positions you've held between then and now?

1 A. Yes. Yeah, of course I can.

2 I started for few -- for some
3 time working in the branches. Just work in
4 the branches.

5 And then I've been -- worked in
6 the finance department as finance -- you
7 know, in the finance department for some
8 time.

9 Then I became responsible for
10 the whole finance reporting to my father who
11 was at that time the general manager of the
12 bank.

13 And then I been moved to work
14 and be managing the -- the investment -- I
15 mean, the international corresponding
16 relationship of the bank and the treasury of
17 the bank. That's the time when they had my
18 training with the -- and actually while --
19 this was position for me when I worked after
20 Citibank training.

21 And then after there was a
22 position called deputy first manager, which
23 mean working under my father like, you
24 know -- because my father there was -- you
25 know, number of deputies reporting to him.

1 So the first deputy was, you know, supposed
2 to be more senior from the other deputy until
3 I became the general manager of the bank in
4 '96.

5 Q. And you served as general
6 manager of the bank from '96 until when?

7 A. I was from '96, I started, and
8 then 2000 -- I think 2004, after eight years,
9 I became almost -- you know, same position,
10 but this is called the CEO. There was a
11 new -- so became CEO of the bank. So this
12 is -- was 2004.

13 Q. And so the general manager and
14 CEO roles were essentially the same in terms
15 of the functions and responsibilities?

16 A. Yes. Yes, you're right.

17 Q. During the period 1998 to 2002,
18 do you have a rough sense of the number of
19 employees who were working at Al Rajhi Bank?

20 A. No, I can't remember the number
21 of employees, but there are thousands, but I
22 can't remember.

23 Q. And during that time period, do
24 you recall approximately how many branches
25 the bank maintained?

1 A. Yeah, there -- there are more
2 than 400 branches.

3 Q. And do you have a sense during
4 that time period approximately how many
5 banking customers the bank had?

6 A. No, I don't remember, but the
7 millions. Of course today we have -- we have
8 more than 20 million customers, maybe 21, 22,
9 today. I don't have the number at that time,
10 but it's millions.

11 Q. But during that time, in your
12 role as general manager, you would have had
13 responsibility for overseeing all of those
14 thousands of employees and the 400 branches
15 on a day-to-day basis, ultimate authority?

16 A. Yes, ultimate authority, you
17 are right.

18 Q. So it was a senior position,
19 correct?

20 A. It is, yes.

21 Q. And you reported only to your
22 father, who was the chairman, and to the
23 board, correct?

24 A. Yeah, of course. Again, to my
25 father and the board, because, you know,

1 the board -- you know, the board is the
2 ultimate boss.

3 Q. During the 1998 to 2000 time
4 period, were you familiar with the -- any of
5 the particular anti-money laundering
6 protocols that were in place at the bank?

7 MR. CURRAN: Mr. Carter, you're
8 limiting that to '98 to 2000? I don't
9 think he said 2002.

10 QUESTIONS BY MR. CARTER:

11 Q. I'm sorry, I meant to say '98
12 to 2002.

13 A. Yes, what's the question? Did
14 we --

15 Q. Were you familiar at that time
16 with any of the particular requirements of
17 the bank's anti-money laundering protocols?

18 A. No, not particular for the
19 bank. It's for the -- and that's only, you
20 know, the new regulation comes and the laws
21 are evolved for the whole industry, for the
22 whole banks, and in many cases the global
23 standards.

24 Q. Do you recall whether the bank
25 had any written instruments in place in the

1 1998 to 2002 time period that set forth its
2 anti-money laundering protocols and
3 requirements?

4 A. Yes, that is -- there is a
5 policy and the procedures about this.

6 Q. And we previously deposed a
7 bank employee named James Galloway who was
8 designated to speak on behalf of the bank.

9 Are you aware of that?

10 A. I am aware you are, yes, you
11 have done this.

12 Q. And, in fact, I understand that
13 Mr. Galloway spent a few hours speaking with
14 you in advance of his deposition.

15 Is that correct?

16 A. Yes, this was correct.

17 Q. During his deposition,
18 Mr. Galloway referenced two written
19 instruments that set forth the bank's
20 anti-money laundering protocols and
21 regulations during that time period. One was
22 a 1997 manual, branch manual, and the other
23 was a 1990 update to that manual.

24 Are you familiar with those
25 documents?

1 A. Well, no. You know, I don't
2 recall the details of it, but I know there's
3 something available. I didn't recall exactly
4 the dates on these.

5 Q. And sitting here today, are you
6 familiar with any of the particular
7 requirements of either the 1997 manual or the
8 1998 update?

9 A. The question, do I -- am
10 familiar with it, or do I know if this exist?

11 Q. No. Are you familiar with any
12 of the specific requirements that were set
13 forth in those documents relating to
14 anti-money laundering procedures?

15 A. No, I would not remember
16 specific requirements at this time, you know,
17 for more than 20 years, but --

18 Q. But do you know whether -- but
19 do you know whether you're familiar with the
20 specific requirements of those documents
21 during the time that they were the governing
22 documents between 1998 and 2002?

23 A. Yes. Yeah.

24 Q. You believe that you were
25 familiar with the particular requirements of

1 those instruments?

2 A. Yes. Yeah, we are -- made sure
3 to keep all the documents for that time.

4 Q. I'm sorry, Mr. Al Rajhi, I'm
5 not being clear and trying to ask a different
6 question.

7 In your role as general manager
8 between 1998 and 2002, do you recall whether
9 you were yourself familiar with the specific
10 requirements set forth in the 1997 manual and
11 the 1998 update?

12 A. No specific -- you know, no, I
13 didn't -- I would not remember now what other
14 specific things at that time.

15 Q. Do you know whether or not you
16 were familiar with the specific requirements
17 during that time?

18 A. Specific for what?

19 Q. Do you recall whether you were
20 familiar during the 1998 to 2002 time period
21 with the specific requirements Al Rajhi Bank
22 had in place to ensure anti-money laundering
23 compliance?

24 A. Yes. Yes. I'm familiar that
25 the bank had all these policies and

1 procedures, but if you ask me what are these,
2 I don't recall it.

3 Q. Okay. And again, I'm just
4 trying to clarify. I understand that now you
5 don't recall, but when you were working as
6 general manager in 1998 to 2002, if I had
7 asked you questions about the manual then,
8 would you have been familiar with the
9 specific requirements --

10 A. Yes.

11 Q. -- set forth?

12 A. Yes, I would be familiar with
13 it.

14 Q. And, again, do the people who
15 are responsible for implementing those
16 procedures report to you?

17 A. As I said, could be report
18 directly, depends, you know, on what
19 function.

20 Q. Do you recall whether during
21 that 1998 to 2002 time period you received
22 any regular reports relating to the bank's
23 anti-money laundering activities?

24 A. Report about that the bank was
25 having any -- any -- any money laundering

1 activity? Is this the question?

2 Q. No, I'm asking whether the
3 people who were responsible for implementing
4 the anti-money laundering protocols provided
5 regular reports to you on their conduct and
6 activities as general manager?

7 A. Yeah. Yeah. No, yes, yeah,
8 they do report, not only to me, but also to
9 the audit committee and to the board.

10 So they are -- they are
11 required to, you know, to make report on a
12 regular basis, you know. Again, based -- you
13 know, for -- for the -- for higher authority
14 actually from me as the general manager,
15 which is the audit committee and then the
16 board.

17 Q. Do you recall how frequently
18 they were required to provide reports on
19 their activities during that time period?

20 A. No, I don't remember that time.
21 And also, again, this is -- we're talking
22 about a lot of things evolved and some
23 requirement change, but -- but today, if you
24 ask me now in the last, you know, 10 years,
25 15 years maybe, they update us every board

1 meeting. Every board meeting we get update.

2 Now, going back to that time, I
3 can't remember, you know, how they do it or
4 how often or what -- or what -- you know,
5 what was the specific things in their
6 reporting.

7 Q. Do you recall during that 1998
8 to 2002 time period whether you had any
9 regular meetings with the personnel
10 responsible for implementing the bank's
11 anti-money laundering protocols?

12 A. Yes. Yeah. I would -- I
13 would -- we would have a meeting when it is
14 needed.

15 Q. And what would trigger the need
16 for a meeting during that time period?

17 A. I don't remember. I don't
18 know. It could be -- it could be update on
19 something. It could be a new policy or, you
20 know -- it's just like -- like managing, of
21 course, you know, compliance was always very
22 important, so if they want to have a meeting
23 where they want to see for something,
24 normally you would -- you know, we will -- we
25 will have time to -- to discuss with them.

1 Q. And do you recall whether
2 during that time period the personnel
3 responsible for the bank's anti-money
4 laundering protocol implementation provided
5 yearly reports on their activities?

6 A. I don't -- we do now. I know
7 we do it for many, many years, but I cannot
8 recall whether -- I can't confirm whether --
9 whether this was from the beginning or not.

10 Because, you know, Mr. Carter,
11 it's -- you know, governance requirement over
12 the years has changed a lot. I mean, not
13 only with our bank or with the Saudi, but to
14 globally. So maybe something which is now we
15 see it, you know, normal maybe -- maybe at
16 that time was, you know, something -- was
17 not -- but I know that whatever the
18 requirements from our Central Bank, we do it.
19 You know, we do it. Whatever the
20 requirements from our CMA authority, Capital
21 Marketing Authority, about this, we apply.
22 We always apply, you know, the regulation,
23 and the governance at the time that we are,
24 you know -- that these are available.

25 But training is difficult to

1 remember, you know, that one that year was
2 there, was not here, which is -- you asked me
3 a very specific question about specific
4 things in a year. Many years I cannot, but I
5 can assure, I can confirm, that we are
6 always, you know, making sure that all these
7 requirements are -- are being applied and
8 practiced in the bank.

9 Q. Mr. Al Rajhi, we've received
10 copies of the 1997 branch manual and the 1998
11 update to that manual.

12 Do you recall whether there
13 were any further developments in Al Rajhi
14 Bank's anti-money laundering protocols
15 between the issuance of the 1998 update and
16 2021?

17 A. Between '90 and 2001? Any
18 update?

19 Q. Any update --

20 A. No, I can't recall it. No, I
21 will not recall it now.

22 Q. And do you recall whether there
23 was -- whether Al Rajhi Bank established any
24 new units during the 1998 to 2001 time period
25 to carry out the anti-money laundering

1 functions?

2 A. Well, again, I cannot recall
3 that, but if that was required by our Central
4 Bank, we would have done it. If a new
5 requirement came, we would have done it.

6 Q. And are you aware of any
7 written instructions or instruments that were
8 created between 1998 and 2001 other than the
9 1997 branch manual and the 1998 update?

10 A. No, I cannot recall it.

11 Q. Okay. As a -- as a general
12 matter, do you recall whether the anti-money
13 laundering protocols in place at the bank
14 during the 1998 to 2002 time period included
15 requirements for onboarding clients?

16 A. For onboarding of clients, any
17 requirements? Yes, there would be always
18 requirements.

19 Q. And would there be requirements
20 during that time period for opening a new
21 account?

22 A. Yes, I would -- I would -- I
23 will -- as far as I remember, yes, there's
24 always doing -- there is requirements.

25 Q. And are you familiar with the

1 concept of know your customer?

2 A. Yes, I am familiar.

3 Q. And do you know whether Al

4 Rajhi Bank's manuals included know your

5 customer protocols during the 1998 to 2002

6 time period?

7 A. Yes.

8 Q. They --

9 A. Yeah. Yeah, I think -- sorry.

10 Q. Do you recall whether Al Rajhi

11 Bank had in place protocols for reporting

12 suspicious transactions during the 1998 to

13 2002 time period?

14 A. Yes. The bank would report any

15 suspicious transaction we had, and there

16 would be -- there would be procedures for

17 this.

18 Q. And as far as you can recall,

19 those would be reflected in the 1997 branch

20 manual and the 1998 update, correct?

21 MR. CURRAN: Objection as to

22 form.

23 You may answer.

24 THE WITNESS: Is that question,

25 has it been updated during this time

1 period or does it apply during this
2 period?

3 QUESTIONS BY MR. CARTER:

4 Q. I'm just asking whether or not
5 you know whether the bank's onboarding
6 requirements and their customer requirements,
7 suspicious activity reporting requirements
8 were embodied in the 1997 manual and the 1998
9 update?

10 A. Yes.

11 Q. And you're not aware of any
12 other documents relating to those issues from
13 the 1998 to 2002 time period?

14 MR. CURRAN: Objection.

15 Overbroad.

16 You may answer.

17 THE WITNESS: No, I'm not aware
18 of any other ones.

19 QUESTIONS BY MR. CARTER:

20 Q. Mr. Galloway testified that
21 during the 1998 to 2002 time period there was
22 a protocol for branch audits.

23 Do you know what he was
24 referring to?

25 A. No, there is -- there would be

1 always -- I don't know what -- what he's
2 referring to, but the -- but there's always
3 will be a branch audit, yes. There's a
4 protocol for branch audit. Part of the audit
5 work we go on to auditing the branches and
6 they have a, you know, protocol how they do
7 that audit.

8 Q. And you recall what types of
9 issues the branch audit looked at during the
10 1998 to 2002 time period?

11 A. You know, these things does not
12 come to me as a general manager, but of
13 course, you know, normally the way that the
14 audit works, you know, to start -- because
15 this is -- you know, the way it works in many
16 cases is being done by -- led by the audit
17 committee.

18 So it's a start with the audit
19 committee, which is, as I said, you know,
20 five members, three are independent. Their
21 responsibility first to do what we call a
22 risk assessment, and in many cases they use a
23 third party to help them.

24 And based on the risk
25 assessment, they put audit down and they give

1 more forecast in certain areas or in certain
2 subject based on the risk assessment.

3 So I wouldn't be surprised
4 during that time the audit committee, you
5 know, focusing more because of the -- there
6 become more importance about money laundry --
7 having combat money laundry.

8 But I will not know as a
9 general manager of the bank or even today at
10 that time, you know, if any change has taken
11 place during that time or not.

12 Q. Do you know during that time
13 whether the branch audits would have included
14 review of randomly selected accounts at the
15 bank to assess any potential money laundering
16 problems?

17 A. I would -- I would assume yes,
18 but I cannot -- you know, this is, again --
19 it's more about the audit and the audit
20 committee and the plan approved by the audit
21 committee.

22 Q. Do you recall during that time
23 period receiving any reports on audits that
24 had identified problems with a particular
25 account?

1 A. No, you know, again, the audit
2 committee, I can't recall now any specific
3 account, but it's -- it's normal, you know,
4 when -- when an audit being made that they
5 find some -- some -- note some observation or
6 something is not being implemented as the
7 policy. That's not unusual for audit to
8 identify.

9 And normally the way it works
10 with an audit, you know, do this, they --
11 they summarize it and they make the words to
12 the audit committee. And from the audit
13 committee comes to the board and normally has
14 not only -- you know, has the issue and the
15 correction and the date to be corrected, and
16 they would monitor these things until they
17 are corrected.

18 But I cannot remember, you
19 know, now any specific case here or there.

20 Q. Mr. Galloway also testified
21 that during the 1998 to 2002 time period,
22 there was also something known as a thematic
23 audit.

24 Do you know what that is?

25 A. So what was the word?

1 Q. He referred to it as a
2 thematic, thematic audit.

3 A. No, I don't know what is -- in
4 English, I don't understand thematic audit.

5 Q. You're aware that discovery in
6 this litigation has focused significantly on
7 the bank's relationships with the Al-Haramain
8 Islamic Foundation and the International
9 Islamic Relief Organization, correct?

10 A. Yes.

11 MR. CURRAN: Please answer yes
12 or no.

13 THE WITNESS: Yes.

14 QUESTIONS BY MR. CARTER:

15 Q. And are you aware that
16 discovery has also been conducted concerning
17 Al Rajhi Bank's relationships with officials
18 of those organizations, including in the case
19 of Al-Haramain, an individual named Aqeel
20 Al-Aqil and another individual named Soliman
21 Al-Buthe?

22 MR. CURRAN: Objection.

23 Mr. Carter, you're asking him
24 whether he's aware of these
25 developments in this litigation?

1 MR. CARTER: Yeah, I'm asking
2 him if he's aware that the claims
3 against his bank encompass the bank's
4 relationships with officials of the
5 Al-Haramain organization.

6 MR. CURRAN: Okay. You may
7 answer that yes or no.

8 THE WITNESS: Yes, I know -- I
9 know that some allegation about
10 Al-Haramain, yes, and some of their
11 officials.

12 QUESTIONS BY MR. CARTER:

13 Q. And you're aware as well that
14 there are also allegations concerning the
15 bank's relationship with the International
16 Islamic Relief Organization, correct?

17 A. Yes.

18 Q. And in some cases, the
19 International Islamic Relief Organization is
20 referred to as the IIRO.

21 If I use that abbreviation,
22 will you understand that I'm referring to the
23 International Islamic Relief Organization?

24 A. Yes.

25 Q. In the aftermath of the

1 September 11th attacks, was there an
2 increased focus on potential terrorism
3 financing risks raised to your attention as
4 general manager of the bank?

5 A. Well, after -- after
6 September 11, of course there was -- you
7 know, there was a lot of inquiries and
8 information acquired by the Central Bank
9 about charities and individuals and also some
10 cases, you know, more focus on certain
11 things.

12 And so that was, you know --
13 that was, you know, after -- we were -- we
14 were -- you know, these things were -- you
15 know, there's more inquiries coming from the
16 Central Banks.

17 Q. And during that time period,
18 1998 to 2002, was the Central Bank known as
19 the Saudi Arabian Monetary Authority?

20 A. Yes, SAMA.

21 Q. All right. And so the Saudi
22 Arabian Monetary Authority was referred to as
23 SAMA, correct?

24 A. Yes.

25 Q. And as a practical matter, SAMA

1 was the Central Bank of Saudi Arabia?

2 A. That is the -- now it's called
3 Central Bank. At that time they call it --
4 so now it's Central Bank, yes. But it's
5 always -- always Central Bank of Saudi
6 Arabia.

7 Q. And as the Central Bank, SAMA
8 was the regulatory authority that was
9 responsible for regulating banks in The
10 Kingdom, including Al Rajhi Bank?

11 MR. CURRAN: Objection to form.
12 You may answer.

13 THE WITNESS: Yes, it is.

14 QUESTIONS BY MR. CARTER:

15 Q. And in the -- in the documents
16 that the bank provided to us in discovery, I
17 saw some communications between you and SAMA
18 relating to terrorism financing issues.

19 Do you recall being involved in
20 those issues at the time period?

21 MR. CURRAN: Objection as to
22 form.

23 You may answer.

24 THE WITNESS: I don't recall
25 the one you talked specifically, but

1 definitely that time was -- you know,
2 there's a lot of communication with
3 the Central Bank about -- as I said,
4 about everything about potential
5 terrorist suspicious.

6 QUESTIONS BY MR. CARTER:

7 Q. And during that time period,
8 there were actions taken by governments to
9 designate entities that were implicated in
10 providing support to al-Qaeda.

11 Are you familiar with that
12 activity in the post-9/11 time period?

13 A. Yes. And what I can tell you
14 that after September 11, you know, we as a
15 bank, and other banks, you know, we -- there
16 was a lot of inquiries coming from SAMA
17 about, as I said before, individual and
18 charities. And -- and we -- we -- we
19 actually work very hard to come back with and
20 answer all these question on time, you know,
21 very quickly. And we are actually proud --
22 proud of what we have done in term of putting
23 all the resources and answering and -- you
24 know, answering these questions to SAMA.

25 So this is -- you know, that

1 was -- and I -- and we understand later, you
2 know, this Al-Haramain foundation has been
3 closed down in Saudi Arabia.

4 Now, you know, but differently,
5 you know, before that, you know, all -- you
6 know, we as a bank work very, very closely
7 with SAMA and giving all the -- and also at
8 the same time, we -- you know, we understand
9 that all this information being given with
10 the Central Bank are shared with the US
11 government, you know, officials.

12 So that was, you know -- I
13 think it was a common effort between the two
14 country, and as I said, we did -- we worked
15 very hard, you know, and really putting all
16 the resource, coming back on time, answering
17 all the question, you know, giving all the
18 individuals and charities needed to do more
19 work to know -- to know more about the
20 information.

21 As I said, I think we did a
22 good job and we are happy that we have
23 participated in -- in this effort for
24 something very important.

25 Q. If we can mark the document at

1 Tab 83, and I think we'll be at ARB 26.

2 JON KNOWLES: Sorry,

3 Exhibit 83?

4 MR. CARTER: Yeah, it's at
5 Tab 83, and we'll be marking it as
6 Exhibit, I think, ARB 26.

7 MR. CURRAN: Just so the
8 witness knows, the numbering, it's
9 continuing from the Galloway
10 deposition, correct?

11 MR. CARTER: Correct.

12 (Al Rajhi Exhibit ARB 26 marked
13 for identification.)

14 QUESTIONS BY MR. CARTER:

15 Q. Mr. Al Rajhi, this is a press
16 release issued by the United States
17 Department of the Treasury reporting on the
18 designation of the Somalia and
19 Bosnia-Herzegovina offices of Al-Haramain
20 Islamic Foundation.

21 Do you see that?

22 A. Yes. This is -- did you say
23 this is about Al-Haramain in Somalia?

24 Q. Yes.

25 A. Okay.

1 MR. CURRAN: Mr. Carter, I'm
2 going to let the witness know. So
3 that screen shows part of the
4 document. If you need to look at the
5 document, you can use this screen over
6 here.

7 THE WITNESS: Yeah. Okay.

8 So --

9 MR. CURRAN: Yeah, you can
10 follow along with Mr. Carter, but I
11 noticed that doesn't cover the whole
12 document.

13 THE WITNESS: Yeah. Okay.

14 QUESTIONS BY MR. CARTER:

15 Q. Mr. Al Rajhi, do you recall in
16 your capacity as general manager of Al Rajhi
17 Bank being notified in 2002 that the United
18 States had designated two branch offices of
19 the Al-Haramain Islamic Foundation for
20 supporting terrorism?

21 A. Yes, I'm aware about it.

22 (Al Rajhi Exhibit ARB 27 marked
23 for identification.)

24 QUESTIONS BY MR. CARTER:

25 Q. And if we can mark as the next

1 exhibit Number 87.

2 Mr. Al Rajhi, this is another
3 press release issued by the United States
4 Treasury Department in 2008 reporting on the
5 designation of a remaining -- an additional
6 office of Al-Haramain.

7 Do you see that?

8 A. Yes, I see in the -- treasury
9 designation Al-Haramain Islamic Foundation.

10 Q. Okay. And do you see that the
11 statement indicates that between 2002 and
12 2004, the United States had designated 13
13 Al-Haramain Islamic Foundation branches?

14 A. Between 2002 and '4, the United
15 States designated 13 official branch
16 operating in Afghanistan...

17 So this is -- sorry, this does
18 not say these are Al-Haramain branches,
19 right. Each of 13 -- if this is the
20 Haramain -- okay. Yes.

21 Q. Okay. And do you recall in
22 your role as general manager receiving
23 notification in that 2002 to 2004 time period
24 that there was a series of additional
25 designations of Al-Haramain branch offices

1 covering, you know, the additional locations
2 listed there?

3 MR. CURRAN: Objection as to
4 form.

5 You may answer.

6 THE WITNESS: Yes, so what's
7 the question?

8 QUESTIONS BY MR. CARTER:

9 Q. Do you recall in your role as
10 general manager receiving notice during the
11 2002 to 2004 time period that there was --
12 that there had been a series of additional
13 designations by the United States of
14 Al-Haramain offices?

15 A. No, I think when you -- this is
16 from the news, yes, they have designated some
17 Al-Haramain branches and closing branches.
18 So we -- we knew this from the news, yes. It
19 not come to us like for official information,
20 but we get it from the news.

21 Q. And the next paragraph down
22 notes that the United States in 2004 had also
23 designated the former head of Al-Haramain
24 Islamic Foundation, Aqeel Abdulaziz Al-Aqil.

25 Do you see that?

1 A. Yeah, several of these branch
2 offices have been -- have also been
3 designated. We can see it here full?

4 MR. CURRAN: Yeah, it's kind
5 of -- yeah, you can use this screen.
6 It's cut off on the other one,
7 Mr. Carter.

8 THE WITNESS: So --

9 MR. CURRAN: The paragraph
10 beginning "several of these branch
11 offices."

12 THE WITNESS: Yes.

13 QUESTIONS BY MR. CARTER:

14 Q. And do you recall receiving
15 notice in that 2004 time period that the
16 United States had designated the head of
17 Al-Haramain, Ageel Al-Aqil, as well?

18 A. Yes, I have heard from the news
19 we -- we would have this.

20 Q. And if we can mark --

21 MR. CURRAN: Mr. Carter, what
22 did you mark that last exhibit as?

23 MR. CARTER: It would have been
24 ARB 27.

25 MR. CURRAN: Yeah, because I

1 think it may have been marked 87.

2 So --

3 MR. CARTER: No, it's at Tab 87
4 in the exhibit folder. It is
5 Exhibit 27. Yeah.

6 And if we can, can we mark as
7 Exhibit 28 the document at Tab 88?

8 JON KNOWLES: Give me one
9 second. 80 is not coming up. One
10 second.

11 MR. CARTER: That's not it.
12 Scott can resend it.

13 JON KNOWLES: Okay. Because
14 that's the Exhibit 80 I've got.

15 MR. CARTER: It was Exhibit --
16 88. It was Tab 88.

17 JON KNOWLES: Oh, I thought
18 you -- okay. My bad. I got that.
19 Okay.

20 MR. CURRAN: Is that it,
21 Mr. Carter?

22 MR. CARTER: It is.

23 (Al Rajhi Exhibit ARB 28 marked
24 for identification.)
25

1 QUESTIONS BY MR. CARTER:

2 Q. And, Mr. Al Rajhi, this is
3 another Treasury Department press release
4 concerning designations of two offices of the
5 IIRO and of the direct -- executive director
6 of the IIRO Eastern Province branch, an
7 individual named Abd Al Hamid Sulaiman
8 Al-Mujil.

9 Do you see that?

10 A. Yes, I see it.

11 Q. And again, do you recall during
12 this 2006 time period receiving information
13 that the United States had designated
14 branches of the IIRO and an official in its
15 Eastern Province branch in Saudi Arabia?

16 A. No, I -- sorry, can you show me
17 where is this?

18 Q. Are you referring to the
19 official in the Saudi office?

20 A. Yes.

21 Q. In the first paragraph, the
22 last sentence, it says, "Treasury
23 additionally designated Abd Al Hamid Sulaiman
24 Al-Mujil, the executive director of the
25 Eastern Province branch of IIRO in The

1 Kingdom of Saudi Arabia."

2 MR. CURRAN: I pointed to the
3 first paragraph of the text.

4 THE WITNESS: Okay. US
5 Treasury designated Abd Al Hamid
6 Sulaiman. Yeah. Okay.

7 This is 2006, right?

8 QUESTIONS BY MR. CARTER:

9 Q. Yeah.

10 And do you recall receiving
11 notice in 2006 that the United States had
12 designated branches of the IIRO and an
13 official from the Eastern Province branch in
14 Saudi Arabia?

15 A. Okay.

16 Q. Okay. Do you recall receiving
17 that information at the time?

18 A. When you say receiving it, from
19 where I receive it?

20 Q. Well, I don't know. I mean, if
21 you -- obviously you've testified that the
22 bank took seriously its obligations following
23 September 11 to address issues related to
24 terrorism financing and was engaged with
25 SAMA.

1 As part of that, do you recall
2 receiving information that two offices of
3 IIRO had been designated and that an official
4 of the Eastern Province had been designated?

5 MR. CURRAN: Objection as to
6 form.

7 You may answer.

8 THE WITNESS: Yeah, I don't --
9 I don't recall, you know,
10 US Department or someone sent this
11 information to us, but we know -- we
12 know about many of the things that you
13 mention from the news. You know, we
14 follow the news, and we made an
15 action. We did an act.

16 We get it -- normally we have
17 it, you know, from -- from -- you
18 know, from the news, especially comes
19 about designation or closing some of
20 the branches.

21 QUESTIONS BY MR. CARTER:

22 Q. Did Al Rajhi Bank have a
23 mechanism in place at the time to monitor the
24 news for information of this nature?

25 A. Yeah, if any information in the

1 public domain for -- you know, for customers,
2 we are aware about it, we will -- we will use
3 it. We will collect it.

4 Q. Did Al Rajhi Bank have any
5 mechanism in place before September 11, 2001,
6 to monitor the news for information
7 implicating its account holders in terrorist
8 activity?

9 MR. CURRAN: Objection as to
10 form.

11 You may answer.

12 THE WITNESS: No, I don't think
13 that -- definitely after September 11,
14 the bank became more active in trying
15 to know -- you know, to know about
16 any -- any designation, but I cannot
17 recall what was -- what was before
18 that, you know, how we were doing it.

19 QUESTIONS BY MR. CARTER:

20 Q. Are you aware that during the
21 1998 to 2002 time period Al Rajhi Bank
22 maintained accounts for Al-Haramain Islamic
23 Foundation?

24 A. Yes. Yeah, I know.

25 Q. And how are you aware of that?

1 A. I'm aware of that because
2 things I have seen it after, you know. But
3 I -- you know, because they really can't just
4 open an account like any charity, but
5 different when there was some more inquiries
6 after September 11 from the Central Bank,
7 then I was aware about it and knowing about
8 these accounts.

9 Q. Were you aware that Al-Haramain
10 maintained accounts at Al Rajhi Bank before
11 September 11, 2001?

12 MR. CURRAN: Objection as to
13 form. Ambiguous.

14 You may answer.

15 THE WITNESS: Yeah, they had an
16 account.

17 Did you ask before or after? I
18 think they had before --

19 QUESTIONS BY MR. CARTER:

20 Q. Yes.

21 A. Yes.

22 Q. I'm sorry.

23 Were you aware before
24 September 11, 2001, that Al-Haramain had
25 accounts at Al Rajhi Bank?

1 A. Really, it's difficult to
2 recall whether I -- but Haramain, yes,
3 Haramain I would assume at that time, it's
4 very active, big charity, so I would -- I
5 would -- yes, I would -- I would know about
6 that they have an account in Al Rajhi, even
7 before September 11.

8 Q. During his deposition,
9 Mr. Galloway testified that Al Rajhi Bank
10 maintained 95 accounts for Al-Haramain that
11 were active during the 1998 to 2002 time
12 period.

13 Do you know whether that is
14 accurate?

15 A. I don't know whether this is
16 number correct or not or accurate, but -- but
17 it's not unusual to have that big number of
18 accounts for a charity.

19 Q. Do you recall conducting any
20 inquiry after issues were raised about
21 Al-Haramain following the September 11th
22 attacks to determine the scope of Al Rajhi
23 Bank's relationship with Al-Haramain?

24 MR. CURRAN: Objection. Vague.
25 You may answer.

1 THE WITNESS: The relationship
2 is normal relationship. It's like any
3 charity.

4 QUESTIONS BY MR. CARTER:

5 Q. At any point after 9/11 did you
6 ask anyone to pull together information
7 concerning the accounts that Al Rajhi Bank
8 maintained for Al-Haramain during the
9 pre-9/11 time period?

10 MR. CURRAN: Objection. Vague.
11 You may answer.

12 THE WITNESS: You know -- you
13 know, at this -- at this -- first,
14 maybe I want to say things and then
15 serious, but differently after
16 September 11 there was a lot and a lot
17 of inquiries from SAMA about
18 Al-Haramain and maybe other charities
19 and individuals.

20 So we were -- as I said before,
21 we were very cooperative and working
22 very hard and quick turnaround time.
23 We put all of the resources needed to
24 give this information to -- to SAMA
25 when they ask.

1 And also at the same time I
2 remember that when there was some news
3 that some of their Al-Haramain
4 branches overseas has been closed
5 down, that we, as a bank, you know,
6 we -- we were proactive. You know,
7 we -- we have -- we have -- wanted to
8 go to our authorities and ask, you
9 know, whether these -- whether
10 anything need to be done about
11 Haramain KSA.

12 Because from what we knew, you
13 know, and the news was -- so we were,
14 you know, proactive -- proactive
15 coming back and saying, you know, we
16 have these things. Is there any new
17 instruction. You know, that was, you
18 know, the message -- so that the
19 message, you know, we were trying to
20 come back to -- go back to both to our
21 regulator and also to the -- the
22 government authority who was -- who
23 can -- who they are responsible to
24 give the permission.

25

1 QUESTIONS BY MR. CARTER:

2 Q. And so we --

3 A. Sorry.

4 Q. No. Can we --

5 MR. CURRAN: You're entitled to
6 finish your answer if you --

7 THE WITNESS: No. I mean, the
8 message is that we did everything that
9 we can do, you know, to reach -- and
10 trying to know. Because it was a
11 difficult time for the bank. You
12 know, it is -- I cannot -- I cannot do
13 anything about these charity account
14 without getting instruction from my
15 regulator. You know, I cannot -- you
16 know, it's not up to the bank whether
17 to -- so what we -- what we're able to
18 do is writing letter and asking, you
19 know, saying that, okay, we have these
20 accounts with us, okay, and of course
21 we know about the news.

22 And as I said, you know, we
23 just -- you know, as a bank, as a
24 responsible bank with all this news,
25 we said, you know, this is the -- this

1 is what's happening, and our -- what
2 we said, we know about this. We said
3 we have these accounts with
4 Al-Haramain, and we wanted to check
5 are you -- should we continue in a
6 way. Should we continue, you know, to
7 as if -- the payments, it's still
8 there or not.

9 (Al Rajhi Exhibit ARB 29 marked
10 for identification.)

11 QUESTIONS BY MR. CARTER:

12 Q. And if we can, can we mark as
13 the next exhibit the document at Tab 32? I
14 think we're up to ARB 29.

15 Okay. Hold on one second.

16 Mr. Al Rajhi, you mentioned a
17 moment ago that you were involved in
18 communicating to SAMA in response to media
19 reports about Al-Haramain.

20 Is that correct?

21 A. Yes.

22 Q. And the document we just marked
23 appears to be a letter sent on January 26,
24 2004, to the Saudi Arabian Monetary Authority
25 by you, correct?

1 A. Okay. Yeah, give me, please,
2 just a minute just to go through it.

3 MR. CURRAN: Mr. Carter, can
4 you put up the Arabic as well, please?

5 MR. CARTER: It should be
6 behind it.

7 MR. CURRAN: Okay. So on this
8 side here, Mr. Al Rajhi, you can look
9 at the --

10 THE WITNESS: Okay. Yeah, this
11 is -- okay.

12 MR. CURRAN: Okay. Got it.
13 Thank you. You can scroll yourself.

14 THE WITNESS: Yes.

15 Yes. Yes, this is what I was
16 referring to before, you know, there
17 was the news about closing these
18 offices and wanted to know from SAMA.

19 QUESTIONS BY MR. CARTER:

20 Q. This is a letter you sent
21 because you're aware that the bank had
22 accounts for Al-Haramain and you -- the bank
23 had seen the reports about additional
24 closures of Al-Haramain offices, correct?

25 A. Yes, that's correct.

1 Q. And in the letter you asked
2 whether the bank should continue dealing with
3 Al-Haramain, correct?

4 A. Right. Yes.

5 Q. Do you recall whether you ever
6 received any response from SAMA?

7 A. No, I didn't recall if I
8 received or not and we...

9 Q. Okay. Can we mark --

10 A. Yeah. Sorry. But I know that,
11 you know -- that the Saudi government lost
12 Al-Haramain data.

13 Q. But again, you don't recall
14 receiving any direct response to this
15 January 2004 letter, correct?

16 A. No, I didn't --

17 MR. CURRAN: Objection. Vague.

18 From SAMA? Was that the
19 question, Mr. Carter?

20 MR. CARTER: Correct.

21 THE WITNESS: Yes, I don't
22 recall whether I received or not.

23 (Al Rajhi Exhibit ARB 30 marked
24 for identification.)
25

1 QUESTIONS BY MR. CARTER:

2 Q. And if we can mark as the next
3 exhibit the document at Tab 33. I believe
4 this will be ARB 30.

5 A. So I can't read it here.

6 MR. CURRAN: They control what
7 exhibits show up.

8 THE WITNESS: Oh, in Arabic, I
9 mean. Here you see it here, but you
10 cannot see it. We just --

11 MR. CURRAN: No, it will come
12 up on this screen.

13 THE WITNESS: Okay.

14 MR. CURRAN: And you can scroll
15 to the Arabic below.

16 THE WITNESS: Okay.

17 MR. CURRAN: You can go all the
18 way to the bottom if you want. You
19 can do whatever you want.

20 THE WITNESS: Yes.

21 QUESTIONS BY MR. CARTER:

22 Q. And is this also a letter that
23 you authored and sent to SAMA?

24 A. Yes.

25 Q. And this letter was sent on

1 January --

2 A. Yeah, it's prepared -- yes, I
3 send it to --

4 MR. CURRAN: Can you ask that
5 question again, Mr. Carter?

6 QUESTIONS BY MR. CARTER:

7 Q. Is this a letter that you sent
8 to SAMA?

9 A. Yes, I did.

10 Q. And you signed the letter,
11 correct?

12 A. I signed the letter, yeah.
13 This -- this is my signature, yes.

14 Q. And this letter was sent by you
15 to SAMA on January 4, 2003?

16 A. This is what's dated in the
17 top.

18 Q. And in that letter you identify
19 a number of charitable organizations that had
20 accounts at Al Rajhi Bank, correct?

21 A. Yes. Right.

22 Q. And the list includes six
23 charitable organizations, and they are the
24 Muslim World League, the International
25 Islamic Relief Organization, the World

1 Assembly of Muslim Youth, Saudi Joint
2 Committee for Relief of the Muslims of Bosnia
3 and Herzegovina and Somalia, the Saudi Joint
4 Committee for the Relief of Muslims of Kosovo
5 and Chechnya, and the Al-Haramain Islamic
6 Foundation.

7 Correct?

8 A. Right.

9 Q. And Al Rajhi Bank was
10 maintaining accounts for all of those
11 entities at the time, correct?

12 A. Yes.

13 Q. What prompted you to write this
14 letter?

15 A. Well, I can't specifically
16 recall right now, but must be -- it's
17 either -- I think this should be -- this
18 maybe should be relating to maybe some
19 SAMA -- some SAMA inquiries about -- or some
20 requirements for SAMA.

21 Because, again, after
22 September 11, the -- the SAMA regulators
23 start -- you know, not only asking about
24 information but also new regulation came
25 about charities, how the charity work. For

1 example, you know, you see circular from the
2 Central Bank at the time that you cannot
3 transfer money for these charity outside The
4 Kingdom. It has to be only in the domestic.

5 Also there was some information
6 about who are -- the authority can -- you
7 know, who are the authority that can give the
8 permission.

9 Q. Well, what prompted you to
10 include these six organizations in your list,
11 if you recall?

12 A. It's difficult to remember now.
13 I can't remember now, but this is -- from
14 what I see here -- from what I see here, this
15 is prepared by our legal department at that
16 time, and I have signed it, but I can't
17 remember what's -- you know, what are these.

18 Q. And based on your understanding
19 of the bank's business at the time, do you
20 believe it would have maintained accounts
21 during that period for additional charities
22 that aren't on this list?

23 A. Can you ask -- can you ask
24 again, please?

25 Q. Well, do you believe that this

1 list includes every charity for which
2 Al Rajhi Bank maintained an account at that
3 time?

4 A. No. No. There's many others.

5 Q. And given that there are many
6 others, do you have any recollection as to
7 why these six ended up being the focus of
8 this letter?

9 A. No, I don't know. As I said, I
10 don't recall exactly, but as I said, could
11 be -- the new circular came from the Central
12 Bank, asked for, you know, certain
13 requirements and maybe these ones based on
14 our legal department review, this is like
15 what you call it, maybe vague, you know,
16 approval.

17 So, you know -- so they wanted
18 to have certainty from regulator, you know,
19 whether these approval the bank has in place
20 is in complying with the -- with the -- with
21 the SAMA circular. That's what I can think
22 of now.

23 Or could be some news about
24 these -- these charities and get it from the
25 news, whatever, and then they wanted to --

1 they wanted to, again, get the confirmation
2 from Central Bank whether the bank should --
3 this is -- you know, this is exactly what I
4 said before, that, you know, when we -- when
5 we hear about something or some development
6 coming, we're always proactive. We want to
7 make sure that any charity have an account at
8 Al Rajhi before that its license is valid,
9 you know, it is, you know, asking whether we
10 can do that. So I wanted to make sure
11 about -- you know, this is initiated by the
12 bank. Part of the bank, you know, wanted
13 and, you know -- we are -- you know, we were
14 assuring that we would like -- as ours we are
15 to comply with the -- with the regulator --
16 with the regulation.

17 Q. Okay. And in the letter, you
18 specifically asked SAMA for advice as to
19 whether or not Al Rajhi Bank should stop
20 dealing with the mentioned charities,
21 correct? In the last paragraph?

22 A. Yes. Yes. But --

23 Q. And so the bank had some
24 concern as to whether or not it was
25 appropriate to continue dealing with those

1 charities, correct?

2 A. Well, as I said, it's not --
3 it's a simple action for the bank. I mean,
4 if the bank has consent, the bank, you know,
5 cannot stop working with a charity unless,
6 you know, you get approval from the Central
7 Bank. It's not up to the bank.

8 So our job, when we -- when
9 we -- when there is -- as I said, you know,
10 news about any organization or a new
11 regulation came and this regulation, you
12 know, we're not sure whether it apply here or
13 not, our job to go and write to the Central
14 Bank and ask them, you know, this is what we
15 have. This is our document. Let us know
16 whether -- what should we do.

17 Q. So, and the Central Bank is
18 responsible for determining whether or not an
19 entity is prohibited outright, correct?

20 A. Yes, the Central Bank. It's --
21 it's who came with the circular saying that
22 if in order to open a charity, one, two,
23 three, four things you have to do. So it
24 comes -- you know, because he supervises the
25 bank so he's the one communicate to the bank

1 what's needed. And this is why we're writing
2 the letter to SAMA telling them, you know,
3 what would they think about these charities.

4 Q. But in terms of who was
5 responsible for implementing anti-money
6 laundering procedures, that would fall to the
7 bank itself, correct?

8 A. Yes, sure. You are correct --
9 to SAMA, yes.

10 Q. And given the concerns raised
11 in this letter, did the bank do anything on
12 its own to investigate the accounts it held
13 for these entities to determine whether or
14 not they reflected possible money laundering
15 or counterterrorism financing risks?

16 MR. CURRAN: Objection as to
17 form.

18 You may answer.

19 THE WITNESS: Yeah, I think
20 again -- maybe I'm repeating myself
21 again.

22 You know, when -- when
23 something like this come, we cannot,
24 you know -- what we can do is write --
25 do like this, so that's number one.

1 Number two, yes, the bank has
2 in place a policy if any suspicious
3 transaction get reported. Now, I
4 cannot tell you, you know, if any
5 transaction here been reported during
6 this time or not, but the bank has a
7 system that when it's a really
8 suspicious transaction, of these ones
9 are others, you know, it would be
10 reported to -- you know, to SAMA about
11 these transaction, about these
12 suspicious amount.

13 So that's -- yes, we do, we do
14 that when there's something -- for any
15 suspicious transaction, but the thing
16 I cannot do, I can't just close that
17 account without -- without -- you
18 know, without getting approving, if
19 they have -- if they have the
20 permission. If they have the
21 permission, it's not up to me to
22 decide to continue or to close the
23 account.

24 QUESTIONS BY MR. CARTER:

25 Q. Okay. You do have the capacity

1 at that time to have someone conduct an
2 inquiry to determine whether or not the
3 accounts for those organizations were opened
4 properly, correct?

5 A. Yes.

6 Q. And you did have the capacity
7 during that time to ask someone to look at
8 the transaction history for those accounts to
9 determine whether or not there were
10 accounts -- or transactions that may have
11 been problematic, correct?

12 MR. CURRAN: Objection as to
13 form.

14 You may answer.

15 THE WITNESS: Yeah, for -- I
16 would -- okay. Let me ask this
17 question. If it was a problematic or
18 a charity, which there's a concern
19 about it, yes, we would have with
20 SAMA, most likely, would have looked
21 at that previous transaction many
22 years ago and go through it, and
23 that's what -- you know, we -- in
24 working with the SAMA about it.

25 So we do that for some -- some

1 charities.

2 QUESTIONS BY MR. CARTER:

3 Q. So you mentioned the bank's
4 desire to be proactive with regard to these
5 issues.

6 Did you instruct anyone to
7 conduct a review of the accounts for these
8 entities to determine whether or not the
9 accounts had been opened properly?

10 MR. CURRAN: Objection as to
11 form.

12 THE WITNESS: I can't recall if
13 I myself conducted any one, but the
14 board, myself and the audit
15 department, you know, they all do
16 their job and make sure that the right
17 people do the right -- conduct.

18 Now, I can't remember if the
19 specific one being done or not. It's
20 difficult to remember.

21 QUESTIONS BY MR. CARTER:

22 Q. So do you recall whether there
23 was any action undertaken in this 2003 time
24 period to conduct audits of these
25 organizations?

1 A. Audit?

2 MR. CURRAN: Objection. Vague.

3 You may answer.

4 THE WITNESS: I wouldn't be
5 surprised we have done. I cannot
6 confirm it.

7 QUESTIONS BY MR. CARTER:

8 Q. And do you recall whether the
9 bank directed anyone to review transactions
10 carried out through the accounts to determine
11 whether there were any transactions that
12 raised red flags?

13 A. Yeah, as I --

14 MR. CURRAN: Objection. Vague.
15 You may answer.

16 THE WITNESS: Yeah, as I said
17 before, yes. You know, it was
18 actually a very busy time during
19 this -- not only us, but also with the
20 Central -- with the Central Bank.

21 And also we know all of this
22 information is not only from SAMA.
23 It's a common work between the Saudi
24 government and the US government to
25 have all the information in order

1 to -- you know, to get -- you know, of
2 any -- of -- if anyone thinks are
3 terrorists or any of this being news.

4 So there was a lot -- a lot of
5 work being done on this, going back,
6 SAMA come to the big banks and take a
7 lot of names, a lot of statements. It
8 was very busy time.

9 QUESTIONS BY MR. CARTER:

10 Q. Well, aside from the activity
11 that was ongoing with the US or Saudi
12 governments, the bank had an independent
13 obligation to ensure that its accounts
14 weren't used for terrorism financing
15 activities, correct?

16 MR. CURRAN: Objection as to
17 form.

18 You may answer.

19 THE WITNESS: Yeah, this is
20 correct. Again, I'm not saying we are
21 not doing. I'm just giving an
22 example, you know, but we are doing
23 this. We hired -- you know, we hired
24 a number of consultants. I can't
25 remember the name, just to go through

1 and check, not check all the -- check
2 the transactions.

3 Of course our external auditor
4 also make his own -- you know,
5 international, they go and look at it.
6 So we -- we have a lot of things to --
7 you know, to make sure that, you know,
8 there are no misuse of any of these
9 transactions.

10 And as I said, there is -- you
11 know, any suspicious ones, whether we
12 know about it based on investigation
13 or it's a new one, we report it to the
14 Central Bank.

15 QUESTIONS BY MR. CARTER:

16 Q. Mr. Al Rajhi, we requested in
17 discovery copies of any audits or reviews of
18 the Al-Haramain or IIRO accounts that were
19 conducted between 2001 and 2004, and we
20 haven't received any. Our understanding is
21 that they don't exist.

22 Do you have reason to believe
23 that's incorrect?

24 MR. CURRAN: Objection as to
25 form. Vague and ambiguous.

1 You may answer.

2 THE WITNESS: Really, you know,
3 I don't know. But not necessarily
4 also the audit for one customer. You
5 know, it could be -- it could be, you
6 know, wide scope, for audit, not only
7 for -- you know, for one foundation.

8 But, again, we're talking about
9 something, you know, almost 20 years
10 ago. You know, I can't tell you that,
11 you know, this is being done or not
12 done.

13 And again, you know, my
14 capacity as a general manager at that
15 time or even at a later time when I
16 was, you know, still called CEO, the
17 audits -- the audit -- the audit
18 committee, they are the -- you know,
19 they are overseeing all these audit to
20 be done to give the comfort for the
21 bank.

22 QUESTIONS BY MR. CARTER:

23 Q. Okay. But sitting here today,
24 you're unaware of any audit that was
25 conducted in the 2001 to 2004 time period

1 that encompassed any accounts of Al-Haramain
2 or IIRO, correct?

3 MR. CURRAN: Objection as to
4 form. Lack of foundation.

5 THE WITNESS: Yeah, I can't --
6 I can't -- as I said, you know, I
7 can't remember to confirm it. I
8 cannot give you a clear answer, you
9 know, whether this is being done or
10 not. I don't recall it.

11 QUESTIONS BY MR. CARTER:

12 Q. And again, this letter was sent
13 on January 4, 2003, and if we can go back to
14 the document that was marked as ARB 29.

15 A. Yeah, but -- yeah. Okay.

16 Q. Okay now?

17 A. Yes.

18 MR. CURRAN: I can't read what
19 this is. Maybe you can.

20 THE WITNESS: Yeah.

21 MR. CURRAN: All right.

22 THE WITNESS: This is -- okay.

23 QUESTIONS BY MR. CARTER:

24 Q. And this is the other letter we
25 discussed relating to Al-Haramain, correct?

1 A. Yes.

2 Q. And this was sent on
3 January 26, 2004, correct?

4 A. January 2004. Yeah.

5 Q. And in the first paragraph you
6 specifically reference your earlier letter
7 from a year ago in 2003, correct?

8 MR. CURRAN: Objection as to
9 form.

10 THE WITNESS: This is
11 January 2004, and I -- {speaking in
12 Arabic}. No, there must be
13 something not -- you know, if you look
14 at -- {speaking in Arabic}. This is
15 only one -- no, cannot be -- you know,
16 it's so only when you look at the
17 dates here and the Hijri dates --
18 {speaking in Arabic}.

19 MR. CURRAN: You can say --

20 THE WITNESS: No, here -- here
21 we have -- this is the first on 24,
22 and then that one -- so there must be
23 only 18 plus 2, 22 days difference.
24 So how can become -- this must be not
25 correct, the Gregorian date.

1 QUESTIONS BY MR. CARTER:

2 Q. Okay. So you believe that this
3 is also a 2003 letter and it's just 22 days
4 later, correct?

5 A. Right. Yes. Right. Yes.

6 Q. Okay.

7 A. Because if you look at the
8 Arabic dates, it's only this number of days
9 difference.

10 Q. And so 22 days after your
11 January 4, 2003 letter, you wrote to SAMA
12 again asking specifically whether or not the
13 bank should continue to deal with
14 Al-Haramain, correct?

15 A. Yes.

16 MR. CURRAN: Objection as to
17 form.

18 You may answer.

19 THE WITNESS: Yes.

20 QUESTIONS BY MR. CARTER:

21 Q. And did you -- do you recall
22 whether you received any response to that
23 letter from SAMA?

24 A. The same thing, I can't
25 remember now whether we receive or not.

1 (Al Rajhi Exhibit ARB 31 marked
2 for identification.)

3 QUESTIONS BY MR. CARTER:

4 Q. And if we can mark as the next
5 exhibit the spreadsheet at Tab 3. This is
6 ARB 31.

7 Mr. Al Rajhi, this is a
8 spreadsheet we prepared summarizing the
9 account statements for Al-Haramain that we
10 received in discovery from the bank, the time
11 periods they were active and the deposits and
12 the withdrawals that flowed through the
13 accounts during the '98 to 2002 time period.
14 And we have a bit of a discrepancy. We
15 identified 94 accounts, and Mr. Galloway
16 identified 95.

17 And if you look at the second
18 page of this spreadsheet -- I'm sorry, the
19 final page.

20 A. The final one.

21 Q. Okay. Our calculation is that
22 those 94 accounts took in 2,146,119,285
23 riyals during the 1998 to 2002 time period.

24 Do you see that?

25 A. Yeah, we just -- the name of

1 the account, 94 accounts with Al-Haramain
2 found that we have.

3 26 million here -- what is 26
4 million --

5 Q. The total column at the bottom.

6 A. Sorry?

7 Q. There's a total column at the
8 bottom.

9 A. Yeah, but the total number
10 before only 26,000, right? And 26 million --
11 and, yeah.

12 Q. There's several pages preceding
13 it.

14 A. Okay. So I see this, yes,
15 total 2.1 billion. Yes, it says the number.

16 Q. And do you recall whether at
17 any point as your role as general manager you
18 asked someone to provide you with information
19 concerning the total value of money that was
20 passed through the Al-Haramain accounts?

21 MR. CURRAN: Objection as to
22 form.

23 You may answer.

24 THE WITNESS: This is -- this
25 is for how many years, this statement?

1 I mean, this --

2 QUESTIONS BY MR. CARTER:

3 Q. It's five -- it's five years.

4 It's 1998 to 2002.

5 A. Oh, five years or more. The

6 '96 to 2004, that's when it is.

7 Q. No, it's 1998 to 2002.

8 A. Okay. Four years. So that's

9 about 500 million a year, average. Yeah.

10 MR. CURRAN: Five years, 1998,

11 beginning of '98 through the end of

12 2002.

13 THE WITNESS: So about 400

14 million a year in this case if it's

15 five years.

16 So what was the question?

17 QUESTIONS BY MR. CARTER:

18 Q. I asked whether or not you had

19 ever asked anyone at the bank to provide you

20 with information concerning the total amount

21 of money that had passed through the bank's

22 Al-Haramain accounts?

23 A. No, I didn't.

24 Q. And do you have any reason to

25 doubt that over that '98 to 2002 time period,

1 the bank took in accounts -- took in deposits
2 for Al-Haramain in excess of 2.1 billion
3 riyals?

4 MR. CURRAN: Objection as to
5 form.

6 You may answer.

7 THE WITNESS: You know, it's --
8 it's not my job as the general
9 manager, you know, to go account by
10 account, charity by charity, and see
11 how much being deposited and how much
12 we -- but, again, the bank has --
13 has -- has the proper controls.

14 I mean, looking at the money
15 coming, transaction by transaction --
16 of course based in the system and at
17 that time. Because we know that
18 system over the years has been evolved
19 and, you know, what -- what system
20 today we have, we believe, is the
21 best, you know, state of art in term
22 of compliance control. That's our
23 system today.

24 Of course at that time it was
25 not as sophisticated as today. But at

1 the same time, as a general manager, I
2 wouldn't know whether Al-Haramain or
3 any organization or any other charity
4 or, you know -- but definitely we have
5 all compliance people. If they -- if
6 they have noticed some of these
7 transaction are not -- are suspicious,
8 they would have done what they are
9 expected to do, which is reporting it.

10 Now, is this amount big or
11 small for a charity very -- at that
12 time before -- before, you know, the
13 started -- you know, before -- when it
14 was very active, respected foundation.
15 So people -- people, you know, in this
16 country, you know, normally like in
17 other country, you know, they -- you
18 know, they -- they want to donate for
19 good reason, and that's -- at that
20 time it was, you know -- it seems to
21 have -- you know, they have done
22 positive.

23 But of course I wouldn't know
24 myself that how much total money any
25 foundation or any charity has.

1 QUESTIONS BY MR. CARTER:

2 Q. I understand that as general
3 manager you wouldn't know the particular
4 details in realtime about an account.

5 But given what you've said
6 about the bank's concerns about Al-Haramain
7 following 9/11, did you as general manager
8 ever ask anyone to provide you with
9 information about the number of accounts and
10 the amount of money that the bank had moved
11 for Al-Haramain?

12 MR. CURRAN: Objection as to
13 form.

14 THE WITNESS: What I know is
15 that this information being collected
16 and being provided to the Central
17 Bank, the SAMA. That's what I know.
18 This is for sure.

19 Now, all these information, all
20 these amount, all these statements
21 went to SAMA at that time to -- you
22 know, because when the suspicious
23 started about -- about Al-Haramain.
24 And we sent it in time. We ask about
25 any inquiries coming. We put all the

1 resource. You know, any response come
2 to us, we have a team and, as I said,
3 you know, we're proud of the way we
4 were doing things, we were fast, and
5 we were coming back. And, you know,
6 we were happy from our contribution to
7 help, you know, in understanding, you
8 know, what's happening in these -- in
9 these charities.

10 QUESTIONS BY MR. CARTER:

11 Q. And when you sent your letter
12 in 2003, SAMA would not have directly
13 available to it information concerning the
14 transactions that were carried out through
15 the accounts, correct?

16 A. In 2003?

17 Q. Correct.

18 A. I don't know. And I would -- I
19 would assume -- again, I can't recall. You
20 know, we're talking about things more than
21 20 years, you know, and they were not working
22 in each statement or each account. It's
23 own -- it's most likely there is a contact
24 between the relevant people in Central Bank
25 and the relevant people in the bank.

1 But, again, from what I
2 understand today, no information been given
3 before that date. That's what I would -- you
4 know, how I expect.

5 Q. But as part of your assessment
6 whether or not the bank should continue to
7 deal with Al-Haramain, do you recall any
8 effort in the 2003 to 2004 time period to
9 conduct any audit of the 2 billion or so
10 riyals that moved into and out of the
11 Al-Haramain accounts of your bank?

12 MR. CURRAN: Objection. Lack
13 of foundation.

14 You may answer.

15 THE WITNESS: Yeah, can you ask
16 again, please?

17 MR. CARTER: Sure. Can you
18 read it back?

19 (Court Reporter read back
20 question.)

21 THE WITNESS: You know, as I --
22 as I said before, I didn't remember
23 whether we had done or not any
24 specific audit for Al-Haramain, but --
25 but as I answered before, we have sent

1 all the information needed. We have
2 done a lot of auditing and checking.
3 Some of these went -- but I can't give
4 a specific answer about whether this
5 has been done or not.

6 QUESTIONS BY MR. CARTER:

7 Q. And do you recall whether the
8 bank initiated any inquiry to determine
9 whether or not the bank had complied with its
10 own anti-money laundering protocols with
11 regard to the opening and maintenance of the
12 Al-Haramain accounts?

13 MR. CURRAN: Objection as to
14 form.

15 You may answer.

16 THE WITNESS: You know, it's
17 the same answer. With the bank, you
18 know, for their audit department, for
19 their compliance, for the audit
20 committee, for bringing a third party
21 coming and auditing the bank, they
22 would -- they would -- you know, they
23 would do this -- this is a normal
24 practice for the bank, you know, to
25 check whether there are any missing or

1 any enrollment need to be done.

2 Specifically -- yeah, sorry.

3 QUESTIONS BY MR. CARTER:

4 Q. So you don't know whether
5 that -- any of that kind of work was done
6 with regard to the Al-Haramain accounts?

7 MR. CURRAN: Objection as to
8 form. Lack of foundation.

9 THE WITNESS: I cannot -- as I
10 said before, I don't recall -- I
11 cannot confirm it. I cannot say
12 that it happened. So I'm not -- you
13 know, it's -- yes, I cannot confirm
14 it.

15 (Al Rajhi Exhibit ARB 32 marked
16 for identification.)

17 QUESTIONS BY MR. CARTER:

18 Q. And if we can, can we mark as
19 the next exhibit the spreadsheet at Tab 2?
20 And this will be ARB --

21 JON KNOWLES: 32.

22 QUESTIONS BY MR. CARTER:

23 Q. -- 32.

24 MR. CURRAN: Mr. Carter, at
25 some convenient point soon, we should

1 consider taking a break. I think it's
2 been almost two hours. I think maybe
3 it's been over two hours.

4 MR. CARTER: Sure. Let me just
5 ask a few questions about this, Chris,
6 and then we'll go ahead. Okay?

7 MR. CURRAN: Sure.

8 QUESTIONS BY MR. CARTER:

9 Q. Okay. Mr. Al Rajhi, this is a
10 spreadsheet that, again, we prepared
11 summarizing the accounts for which we
12 received statements from ARB relating to the
13 Islamic -- the International Islamic Relief
14 Organization at the time period they were
15 active and the total deposits and withdrawals
16 that flowed through those accounts.

17 And again, there's a bit of
18 discrepancy. Based on the review of the
19 discovery, we've identified 287 accounts, and
20 if I recall correctly, Mr. Galloway indicated
21 that the bank had identified 308 accounts.
22 This just covers the 287 that we identified.

23 And turning to the last page,
24 our review reflects that about 2.974 billion
25 riyals moved in to the 287 IIRO accounts

1 between 1998 and 2002, and about 2.91 billion
2 moved out of them.

3 Do you see those figures?

4 A. Yes. Yes, I see it.

5 Q. And again, as I asked you about
6 with Al-Haramain, do you recall ever
7 requesting in the aftermath of 9/11 when
8 concerns were raised about certain charities,
9 that someone review the IIRO accounts and
10 provide you information with regard to the
11 number of accounts and the amount of money
12 that moved through them?

13 MR. CURRAN: Objection as to
14 form. Lack of foundation.

15 You may answer.

16 THE WITNESS: This I will -- my
17 answer would be the same as Haramain
18 one. I wouldn't know as -- you know,
19 about -- about these amounts. I
20 haven't, you know -- but -- so, you
21 know, I cannot -- it's not expected
22 for -- for the -- for the general
23 manager or the CEO to -- to see that
24 amount and see how much money. It's a
25 process. There's a system, process.

1 You know, we go and -- first,
2 you know, these -- all -- you know,
3 this is one of the organization all of
4 the information gets sent to the SAMA
5 from the beginning, you know. So all
6 the transaction. And so I'm sure
7 that, you know, between our people and
8 SAMA, you know, they have sent all the
9 information, all these details are
10 available.

11 Again, if there was any
12 suspicious transaction, could -- but
13 not -- would have been reported, you
14 know, because that transaction is a
15 suspicious transaction.

16 Again, to -- you know, I would
17 expect, again, that our audit
18 committee and our audit department,
19 our compliance people, we would do
20 normal, you know, review and checking
21 about -- because it's -- as I said
22 before, you know, it's not only the
23 bank consider themselves like this, but
24 even we bring third party to come and
25 we always applied the best compliance

1 standard at the time there.

2 Also we -- from time to time,
3 you know, we have created systems. We
4 always invest in our system because --
5 and making sure that our systems are
6 capable. And as we know these things
7 are evolving, changing, so always we
8 are -- and again, we are -- and happy
9 today we believe that our -- you know,
10 our governance is one of the best in
11 compliance.

12 QUESTIONS BY MR. CARTER:

13 Q. Mr. Al Rajhi, we've asked for
14 Al Rajhi Bank to produce any audit from the
15 1998 to 2004 time period that touched upon
16 any of these IIRO accounts, and we haven't
17 received any. So it's our understanding that
18 there are no audits related to these accounts
19 that moved about 2.9 billion riyals.

20 Do you have contrary
21 information to suggest that there was ever an
22 audit touching on any of these accounts?

23 MR. CURRAN: Objection as to
24 form. Lack of foundation and asked
25 and answered.

1 You may answer.

2 THE WITNESS: As, again, I
3 cannot -- I cannot recall whether
4 being done or not, number one.

5 Number two, all of these -- you
6 know, all of this information about
7 this customer is being sent on time,
8 you know, to SAMA, okay, about -- you
9 know, and again, if any of these
10 transaction was suspicious, we would
11 have reported these transactions.

12 Now, is there any audit being
13 done specifically to one customer
14 account, I cannot tell you whether
15 this is being done or not.

16 QUESTIONS BY MR. CARTER:

17 Q. And to be clear, I wasn't
18 referring to just audits that were focused
19 exclusively, but audits that in any way
20 touched upon these accounts.

21 Are you aware of the existence
22 of any audit of any of the IIRO accounts?

23 MR. CURRAN: Objection. Vague.

24 You may answer.

25 THE WITNESS: No. No way to

1 remember this after 20 years whether
2 that, you know, being done or not for
3 a specific time. No, I cannot
4 remember.

5 QUESTIONS BY MR. CARTER:

6 Q. And we've also asked for any
7 suspicious activity reports relating to any
8 of the 2.9 billion dollars {sic} in
9 transactions that were carried out through
10 these accounts, and we've not received any.

11 Do you know whether there were
12 any suspicious activity reports ever filed in
13 relation to these accounts?

14 A. No --

15 MR. CURRAN: Objection as to
16 form.

17 You may answer.

18 THE WITNESS: Yeah, Mr. Carter,
19 you know, the same. It's really --
20 you know, I'm not in a position now
21 to -- to give you a specific answer
22 for one specific account anything
23 being reported or not. No, I
24 cannot -- you know, I cannot. I'm not
25 in the position to know whether it's

1 being done or not.

2 QUESTIONS BY MR. CARTER:

3 Q. And again, do you recall after
4 September 11, 2001, whether you ever asked
5 anyone at the bank to conduct any kind of
6 review of the IIRO accounts to determine
7 whether or not there were any risks or
8 problems with the way they were opened or
9 operated?

10 MR. CURRAN: Objection as to
11 form.

12 You may answer.

13 THE WITNESS: No. No. You
14 know, I know that for this charity,
15 after September 11, all the
16 information being discussed and being
17 given and being provided to SAMA.

18 So if -- whether -- you know,
19 when you give it to Central Bank for
20 it to be reviewed and giving all the
21 information, that's -- you know,
22 whether you call it audit or not
23 audit, but that's -- the job is being
24 done.

25

1 QUESTIONS BY MR. CARTER:

2 Q. And what --

3 A. Yeah, sorry.

4 Q. I'm sorry.

5 What information related to
6 these accounts do you recall having been
7 given to SAMA?

8 A. What information? What do you
9 mean by "what information," Mr. Carter?

10 Q. You said "all of this
11 information was given to SAMA."

12 What did you mean?

13 A. Well, I mean the statement of
14 the accounts, you know, of any, you know,
15 more information about for sometimes the
16 statements -- again, I'm not saying this is
17 what happened, but this is, you know -- could
18 be operation things that you send the
19 statements, then they are more interested in
20 one transaction, they want to see the
21 original or the transaction details of that
22 transaction so they have full details about,
23 you know, the beneficiary or about the
24 payment or -- so -- so, you know, I need more
25 details because it started with sending over

1 everything about -- and then, of course, you
2 keep receiving more inquiries and then -- as
3 I said, you know, as a bank, it was very busy
4 time and we have relocated big resource in
5 the bank, and we did very good job in
6 responding on time. Because time was
7 important at that time. And we -- and we
8 have been told that we need to get to this
9 quick and we are reporting in time saying,
10 you know, these are -- any future inquiry or
11 more details inquiry.

12 So I don't know whether you
13 want to call this audit or you want to call
14 it not audit, or if this is enough or
15 something, I cannot. But I know we have done
16 everything can be done about any of, let us
17 say, charity that there is a suspicious about
18 it.

19 Q. And I'm just -- again, I'm just
20 trying to clarify, Mr. Al Rajhi.

21 During the 2001 to 2004 time
22 period, do you recall whether all of the
23 transaction information for the IIRO accounts
24 was, in fact, sent to SAMA, or are you just
25 speculating that it may have been?

1 MR. CURRAN: Objection as to
2 form.

3 But you may answer.

4 THE WITNESS: Yeah, I would say
5 most likely now after 20 -- because I
6 know they were interested in charity,
7 including this one, but if you asked
8 me now, you know, this I need -- you
9 know, but I would say most likely that
10 was -- that was the case.

11 QUESTIONS BY MR. CARTER:

12 Q. Do you recall when that would
13 have occurred?

14 A. No, I can't recall which, but
15 after September 11.

16 Q. And what about Al-Haramain? Do
17 you recall whether the bank sent all of the
18 transaction information related to
19 Al-Haramain to SAMA?

20 A. I know that, yes, SAMA was
21 interested to know everything about the
22 transaction for the Al-Haramain, and we have
23 sent all information they were asking about.

24 Q. And when did that happen?

25 A. After September 11. I can't

1 recall, you know, which month, which years.

2 Q. And do you recall whether it
3 happened at any point before 2004?

4 A. Yeah. Most likely, yes,
5 because, you know, 2000 -- I think by that
6 time already being closed, so -- so -- so I
7 would expect, yes, before 2004.

8 Q. The two letters we referred to
9 earlier, your January 3rd -- your January 4,
10 2003 and January 26, 2003 letter don't refer
11 to any transaction information that had been
12 provided to SAMA, correct?

13 A. Which letter are you referring
14 to?

15 Q. The first is the January 6,
16 2004 letter.

17 A. Yes. No, that's --

18 Q. And January --

19 A. No, that's -- that's about
20 something else. Yeah, this is -- this is
21 about, you know, as I said, you know,
22 these -- their branches were under -- being
23 closed overseas and wanted to know whether we
24 continue doing business or not. So this was
25 not about -- about information, whether

1 information you send or not send. This is
2 totally different -- different matter, I know
3 it.

4 Q. In discovery we've sought any
5 communications with SAMA related to these
6 charities through 2004, and we've not seen
7 any communication related to the provision of
8 transaction information to SAMA for
9 Al-Haramain or IIRO.

10 Do you know, in fact, whether
11 or not that information was sent before 2004?

12 A. As I said, I think, yes. But,
13 again, you know, these things, normally they
14 don't send a letter. I didn't even -- I
15 didn't need to see it. It's the relevant
16 people in SAMA working with the relevant
17 compliance team in the bank, and working in
18 this -- it's not -- it would not be -- it
19 would not be like letter come to me and then
20 of course it's working directly together.

21 Q. Do you know whether SAMA
22 actually conducted any review of the
23 transaction history for the Al-Haramain
24 accounts?

25 A. Of course I -- you know, I --

1 SAMA does not discuss with any bank, you
2 know, what they review, what they have done.
3 Our job to give them information with the
4 full details and work closely with them for a
5 little bit more information and more details
6 to be given.

7 And then I know of course we
8 knew that they have decided to close down
9 Haramain. Now, what information and what --
10 this is normally given to the bank
11 information.

12 MR. CARTER: Okay. Chris, this
13 is a fine time for a break. How long
14 do you want to take?

15 MR. CURRAN: I would like to
16 keep it to just ten minutes, if that's
17 okay.

18 THE WITNESS: Yeah, for me.

19 MR. CARTER: That's fine.

20 MR. CURRAN: Okay.

21 VIDEOGRAPHER: Off the record.

22 4:49 p.m.

23 (Off the record at 4:49 p.m.)

24 VIDEOGRAPHER: On the record.

25 5:03 p.m.

1 QUESTIONS BY MR. CARTER:

2 Q. Mr. Al Rajhi, we've spoken a
3 bit about the bank's interaction with SAMA
4 relating to the charities.

5 Do you recall whether SAMA ever
6 raised any concern to the bank about
7 Al-Haramain during the 1998 to September 11,
8 2001 time period?

9 A. I mean, SAMA, as I said, they
10 were -- after September 11, they were, you
11 know, coming to the banks and asking for all
12 information.

13 So whether this, you call it
14 concern, but definitely there was a concern,
15 and this is why they were -- you know, they
16 wanted to know everything about it. They
17 want to see every document. They wanted to
18 check of us. So SAMA was active.

19 Q. I'm asking in the period before
20 September 11, 2001, Mr. Al Rajhi.

21 Do you recall whether SAMA ever
22 raised concerns to Al Rajhi Bank about
23 Al-Haramain Islamic Foundation?

24 A. No.

25 MR. CURRAN: Starting in 1998.

1 THE WITNESS: Yeah. No, I'm
2 not -- I don't recall any -- before
3 September 11, there was any concern
4 from SAMA. I think -- I'm not.

5 QUESTIONS BY MR. CARTER:

6 Q. And you've had extensive
7 dealings over your career with SAMA, correct?

8 A. Well, I did like for general
9 manager for bank.

10 Q. Do you know whether SAMA was
11 part of the Saudi government?

12 A. Part of the Saudi government?
13 SAMA is the Central Bank of Saudi Arabia.

14 Q. Okay. And given that it's
15 Central Bank, it's your understanding that
16 it's part of the Saudi government?

17 MR. CURRAN: Objection as to
18 form.

19 You may answer.

20 THE WITNESS: Well, I'm not --
21 I think, yes, Central Bank, they like
22 to be independent, but they are part
23 of the government.

24 QUESTIONS BY MR. CARTER:

25 Q. And again, you have no

1 recollection of having received yourself any
2 information that SAMA expressed concerns
3 about Al-Haramain at any point prior to
4 2001 -- September 11, 2001, correct?

5 MR. CURRAN: Objection as to
6 form as to time frame.

7 You may answer.

8 THE WITNESS: Yeah, I don't
9 recall that I received any concern
10 from SAMA before September 11 about
11 Al-Haramain.

12 QUESTIONS BY MR. CARTER:

13 Q. And in the aftermath of the
14 September 11 attack, you went to SAMA in
15 writing to request advice as to whether or
16 not the bank should continue to deal with
17 Al-Haramain, correct?

18 A. Yes.

19 Q. And do you recall SAMA ever in
20 response to those letters in 2004 raising any
21 objection to the bank continuing to deal with
22 Al-Haramain?

23 MR. CURRAN: Objection as to
24 form.

25 You may answer.

1 THE WITNESS: No, as I said, I
2 didn't recall if SAMA answered this
3 letter, but I'm not aware of any
4 rejection came from SAMA prior to
5 their closing their branches.

6 QUESTIONS BY MR. CARTER:

7 Q. And you spoke at some length
8 about the ways that the bank goes about
9 diligenting its accounts, and I think you
10 referred to suspicious activity reporting and
11 functions of the audit committee, correct?

12 A. Yes.

13 Q. And do you agree that the
14 effectiveness of the bank's anti-money
15 laundering protocols depends on the personnel
16 actually adhering to those protocols?

17 A. Yes, I would say the bank is
18 always doing its best to adhere to the -- to
19 these standards or protocols.

20 Q. Okay. And those would include
21 the requirements for onboarding new accounts,
22 opening new accounts, the know your customer
23 rules and the suspicious activity reporting
24 obligations, correct?

25 You've frozen. I'm sorry, you

1 froze for a minute there, Mr. Al Rajhi, so I
2 didn't quite catch your answer.

3 A. No, I was saying that, yes, the
4 bank was always, you know, trying to make
5 sure that it adhered to all these
6 requirements.

7 Q. And failure to adhere to those
8 requirements creates a money laundering
9 vulnerability, correct?

10 MR. CURRAN: Objection as to
11 form.

12 You may answer.

13 THE WITNESS: Yeah, everything,
14 including money laundering, yes.

15 QUESTIONS BY MR. CARTER:

16 Q. And again, do you recall during
17 this time period that you were raising issues
18 with SAMA about Al-Haramain in 2003 and 2004,
19 whether you ever asked anyone to collect any
20 suspicious activity reports that had been
21 filed with regard to Al-Haramain
22 transactions?

23 A. Yeah, I think I already
24 answered this before. You know, we were
25 sending, you know, all the information based

1 on SAMA request for everything about
2 Al-Haramain. So we -- you know, we were
3 doing this.

4 (Al Rajhi Exhibit ARB 33 marked
5 for identification.)

6 QUESTIONS BY MR. CARTER:

7 Q. If we can mark as the next
8 exhibit the document at Tab 15. Which is
9 going to be Exhibit ARB 33.

10 Is this a letter that you
11 signed in February of 2004?

12 MR. CURRAN: Mr. Carter, wasn't
13 this -- let me ask the question. Is
14 this exhibit different from a very
15 similar exhibit you used in the
16 Galloway deposition?

17 MR. CARTER: Chris, I think the
18 issue is that given the scope of the
19 changes, due to the removal of
20 redactions in documents, we were
21 having trouble figuring out which were
22 identical or not identical and so
23 we're just going to go ahead and mark
24 things sequentially.

25 MR. CURRAN: Okay.

1 THE WITNESS: So this is the
2 Arabic one here and --

3 MR. CURRAN: Yeah, there's the
4 Arabic.

5 THE WITNESS: Okay. Yes.

6 QUESTIONS BY MR. CARTER:

7 Q. And did you, in fact, send this
8 letter?

9 A. Yes, my name and my signature
10 is there.

11 Q. Do you recall who actually
12 prepared the draft of this letter that you
13 signed?

14 A. Yeah, I can see here. This is
15 initialed by our legal department.

16 Q. And who in the legal department
17 initialed it?

18 A. From what I can read here, the
19 head of legal department. His name is Saleh
20 Jabur {phonetic} at that time.

21 Q. And is he still with the bank?

22 A. No, he's not.

23 Q. And this letter is addressed to
24 the Minister of Islamic Affairs, Sheikh Saleh
25 bin Abdul-Aziz bin Mohamed Al ash-Sheikh,

1 correct?

2 A. Yes, it's correct.

3 Q. And in the letter you also
4 refer to him as the general supervisor of the
5 Al-Haramain Islamic Foundation.

6 Do you see that?

7 A. Yes.

8 Q. Do you recall what information
9 the bank had at the time indicating that he
10 was the general supervisor of the Al-Haramain
11 Islamic Foundation?

12 A. I think this is, again, being
13 prepared by our legal department because he
14 has this position. Must be, you know, what I
15 would -- with this letter that be -- this is
16 his -- he has this position, general
17 supervision, Al-Haramain Islamic Foundation.

18 Q. In this time period when you
19 wrote the letter in 2004, did you know Sheikh
20 Saleh bin Abdul-Aziz bin Mohamed Al
21 ash-Sheikh?

22 A. No. Of course I know about
23 him, but -- but so he was the minister,
24 but -- but the question did I know him by
25 this letter personally, no, I didn't know

1 him.

2 Q. Okay. Do you recall whether
3 you had ever met him in person prior to this
4 point in time?

5 A. During this period or after?

6 Q. Prior.

7 A. Prior.

8 Prior, no, I -- I didn't
9 recall, you know. It could be -- maybe in,
10 you know, without noticing and some section
11 or something like this, but I don't remember
12 I met him in person.

13 Q. Do you know whether your
14 father, Sulaiman Abdul Aziz Al Rajhi knew
15 Minister of Islamic Affairs Sheikh Saleh bin
16 Abdul-Aziz bin Mohamed Al ash-Sheikh during
17 this period?

18 A. I don't know.

19 Q. So you don't know whether or
20 not your father had ever met him at any point
21 up to 2004?

22 A. Up to 2004, yes, I'm not -- I
23 don't know that I had met him or not.

24 Q. And in the letter you advise
25 Minister Al ash-Sheikh that, "since there is

1 no permit from the competent agencies for the
2 Al-Haramain Islamic Foundation to operate the
3 charity work according to the documents
4 provided by the Al-Haramain Islamic
5 Foundation to the company when opening its
6 accounts, please authorize your competent
7 agency to issue the required permit."

8 Do you see that?

9 A. Yes. Yes, I see it.

10 Q. And do you know what prompted
11 you to write the letter raising that issue?

12 A. No, I think when I look at the
13 date, 2004, this letter must be, again, a
14 reaction from the bank and proactive from the
15 bank after the closing down of Al-Haramain
16 branches overseas.

17 So this letter must be from our
18 legal department, you know. And this is the
19 same, as I said, we send also to SAMA at the
20 same time, you know. So that's -- that's why
21 the letter is being sent.

22 Q. And according to the
23 information provided by your legal
24 department, the bank did not have any permit
25 for Al-Haramain Islamic Foundation to conduct

1 charity work when it opened the accounts for
2 Al-Haramain, correct?

3 MR. CURRAN: Objection as to
4 form. Lack of foundation.

5 You may answer.

6 THE WITNESS: No, I -- I know
7 that we have -- we have approval, you
8 know, goes back to the beginning of
9 Al-Haramain. So there was -- there
10 was a permit, permission from -- to
11 have -- to have from the beginning.

12 Now, you are right. Here there
13 is no permit from the competent
14 agencies for the Al-Haramain Islamic
15 Foundation to operate. You know, I
16 didn't think this was accurate because
17 the bank had the license but also at
18 the same time SAMA came with the new
19 circulars before this letter, you
20 know, with a new regulation for the
21 charities, including the -- you know,
22 that's who are all involved.

23 That's all I know it's about
24 Al-Haramain, so this letter is being
25 sent, you know, to -- to get, in other

1 words, new -- I would say new -- new
2 approval or new permit office based on
3 the news.

4 Because, you know, if you have
5 a charity here and you know there are
6 branches overseas being closed, then
7 you ask yourself, you know, without
8 still I need -- you go -- as part of,
9 you know, becoming proactive, go back
10 to the same one who gave us and say,
11 okay, you know, do I need -- you know,
12 is this approval still there, but
13 maybe, yes, the words here, it's
14 not -- there's no permit, I think it's
15 not accurate.

16 QUESTIONS BY MR. CARTER:

17 Q. Okay. But you agree with me
18 that the letter represents that there was no
19 permit from the competent agencies for
20 Al-Haramain Islamic Foundation to operate the
21 charity work according to the documents
22 provided by the Al-Haramain Islamic
23 Foundation to the company when opening its
24 accounts.

25 Correct? It says that?

1 A. Yes. Yeah. It said that, yes.

2 Q. And the reference to the
3 company there is a reference to Al Rajhi
4 Bank, correct?

5 A. Al-Haramain Islamic Foundation,
6 the -- yes, this is referring to the bank.

7 Q. Okay. And the requirement for
8 the bank to have a permit for charitable
9 organizations in order to open an account
10 wasn't a new requirement after 9/11. It
11 existed prior to 9/11, correct?

12 A. That -- the requirement was
13 existing before September and the permission
14 was before September 11.

15 Q. And are you aware that Minister
16 of Islamic Affairs Saleh bin Abdul-Aziz Al
17 ash-Sheikh has testified in this litigation?

18 A. No, I'm not familiar with this.

19 Q. And have you ever spoken to him
20 about this litigation?

21 A. No, I never spoke to him about
22 this litigation.

23 Q. If we can mark as the next
24 exhibit the transcript at -- actually, I'm
25 sorry, let's not mark this as an exhibit. It

1 contains confidential information,
2 potentially FBI material. So -- okay. I'm
3 sorry. The exhibit is actually only the
4 excerpted pages from the transcript, so it's
5 fine, we can mark it as an exhibit.

6 MR. CURRAN: I would like some
7 clarification, Mr. Carter. Did you
8 say that this may be subject to the
9 FBI protective order?

10 MR. CARTER: I wasn't entirely
11 sure, but the pages that we are
12 marking are not.

13 MR. CURRAN: Okay. Well, we're
14 at your mercy. We can't confirm that
15 right now, so...

16 JON KNOWLES: What's the tab
17 number?

18 MR. CURRAN: I think that was a
19 question for you, Mr. Carter.

20 MR. CARTER: Yeah, we're just
21 doubly confirming that we don't have
22 any issue with the marking of this.

23 MR. CURRAN: Okay. While
24 you're doing that, Mr. Carter, just to
25 be clear, we have people in the room

1 and presumably on the line who are not
2 signed on to the FBI protective order.

3 MR. CARTER: Yeah, understood.

4 MR. CURRAN: Including the
5 witness.

6 MR. CARTER: To be safe, we're
7 going to refrain from marking the
8 exhibit right now.

9 QUESTIONS BY MR. CARTER:

10 Q. But I'm going to represent to
11 you that Minister Al ash-Sheikh was asked
12 whether or not he ever held a position with
13 the Al-Haramain Islamic Foundation, and he
14 testified no, and was asked whether he was
15 ever involved in any activities of the
16 Al-Haramain Islamic Foundation, and testified
17 no.

18 Is that testimony consistent
19 with your understanding, Mr. Al Rajhi?

20 MR. CURRAN: Objection as to
21 form.

22 You may answer.

23 THE WITNESS: No, I have no
24 idea about how or whether he's
25 involved or not, but I know, you know,

1 we have received a letter from -- from
2 him having this title. So that's
3 what -- you know, this is why we send
4 the letter with the title because
5 letter coming from -- you know, from
6 him having -- having that -- you know,
7 the same title we use in our letter we
8 send it to him.

9 QUESTIONS BY MR. CARTER:

10 Q. Okay. And he also testified
11 during his deposition that Al-Haramain had
12 worked without a permit and was not licensed,
13 and that as a result, it was ultimately shut
14 down because it had been operating without a
15 permit or a license.

16 Is that consistent with your
17 understanding of Al-Haramain's status?

18 MR. CURRAN: Objection as to
19 form.

20 You may answer.

21 THE WITNESS: No, you know,
22 Al-Haramain had a license, as I said
23 before. So it was -- it had a
24 license. When they opened the account
25 with us, there was a license which as

1 I -- which as I refer to before.

2 QUESTIONS BY MR. CARTER:

3 Q. The minister testified that
4 Al-Haramain was instituting and worked
5 without a license and performed work without
6 governance.

7 Again, did you ever -- is it
8 your understanding that Al-Haramain was
9 operating without a license and governance?

10 MR. CURRAN: Objection as to
11 form.

12 And to be clear, my objection
13 relates to this summary of a different
14 witness' testimony, but the witness
15 may answer.

16 THE WITNESS: You know, I --
17 again, I have -- I didn't know nothing
18 about Al-Haramain -- how Al-Haramain
19 operate or they have or they didn't
20 have. This is I'm not aware of it.

21 You know, again, you know,
22 please, Mr. Carter, we are a bank, you
23 know. We do our job as a bank in
24 working with Al-Haramain charity as
25 well as many, many other charities.

1 And our job is to do their banking
2 facilities, the banking -- we will
3 facilitate their banking work, but we
4 didn't involve or we didn't have
5 enough information about, you know,
6 whether their -- you know, whether
7 their -- you know, how -- their policy
8 inside or their procedures or, you
9 know, who is taking the title other
10 than what -- what the bank document
11 shows, which is -- which is normally
12 part of opening the account for any
13 charity.

14 QUESTIONS BY MR. CARTER:

15 Q. Well, I'm asking, the minister
16 has obviously offered testimony or has
17 offered testimony, I'll represent to you, in
18 this case, that Al-Haramain operated without
19 a permit and a license, and if that is
20 accurate, it would mean that Al Rajhi Bank
21 was maintaining accounts for an entity that
22 was not licensed to engage in charity work.

23 And is it your understanding
24 that Al-Haramain was, in fact, licensed?

25 A. Yes, that's my understanding.

1 MR. SHEN: This is Andy Shen.

2 Objection to form.

3 (Al Rajhi Exhibit ARB 34 marked
4 for identification.)

5 QUESTIONS BY MR. CARTER:

6 Q. If we can mark as the next
7 exhibit the document at Tab 99.

8 Mr. Al Rajhi, this is a letter
9 that Al-Haramain -- or that Al Rajhi Bank
10 produced that appears to be directed to you
11 and from the Minister of Islamic Affairs.

12 Do you see that?

13 A. Yes. Let me just -- I think I
14 have it in Arabic here, just so -- yes. Yes,
15 I see it.

16 Q. Okay. And this is -- this is a
17 letter -- is this a letter responding to your
18 inquiry about the permit for Al-Haramain?

19 A. Yes, he's -- he's referring to
20 my letter, yes.

21 Q. And this -- the Minister of
22 Islamic Affairs responds to your letter
23 inquiring as to whether or not Al-Haramain
24 was permitted, correct?

25 A. You know, I can't recall the --

1 the number of the letter, but the meaning,
2 yes. Because he's referring to letter 633.
3 I don't know what was the number of my
4 letter. So if it is the same letter, it must
5 be, yes, they're the same.

6 Q. And in this letter the Minister
7 of Islamic Affairs represents to you that, in
8 fact, Al-Haramain Islamic Foundation is
9 authorized to practice charity work?

10 A. Yes.

11 Q. And so on receipt of this
12 letter, did you understand the Minister of
13 Islamic Affairs had information available to
14 him confirming that Al-Haramain was licensed
15 to practice charity work?

16 A. Yeah, and his letter I think
17 was seen and is authorized to -- I mean,
18 that's what the letter says. Authorized to
19 practice charity work. It is fine to open an
20 account for it with the company according to
21 the regulation and instruction of the Saudi
22 Arabian -- Saudi Arabian Monetary Authority.

23 So maybe it is -- so, yes,
24 here, he's saying it's -- you know, it's --
25 it's a -- it's authorizing the bank to do.

1 (Al Rajhi Exhibit ARB 35 marked
2 for identification.)

3 QUESTIONS BY MR. CARTER:

4 Q. Okay. And if we can mark as
5 the next exhibit the document at Tab 17.

6 And there is also an Arabic
7 version of this.

8 MR. CURRAN: This is
9 Exhibit 35?

10 MR. CARTER: Yes.

11 THE WITNESS: Yeah, here we
12 have it in English.

13 Yes, this is from the justice
14 ministry.

15 QUESTIONS BY MR. CARTER:

16 Q. Do you recognize this document?

17 A. I'm sorry?

18 Q. Do you recognize this document?

19 A. Yes. Yes, I recognize it.

20 Q. And what is it, as you
21 understand it?

22 A. This is a letter from the
23 Ministry of Justice talking about the Muslim
24 World League and the World Assembly of Muslim
25 Youth, Al-Haramain Islamic Foundation, the

1 International Islamic Relief Organization.
2 You know, he witness for -- as the Minister
3 of Justice.

4 You know, in the top he said
5 that the Minister of Justice of The Kingdom
6 of Saudi Arabia confirm that the following
7 are legally established in Saudi Arabia and
8 are permitted to operate.

9 Q. And so this is a document from
10 the Minister of Justice confirming that
11 Al-Haramain Islamic Foundation was, in fact,
12 licensed to do charity work, correct?

13 A. Well, again, you know, we have
14 approval from the beginning from -- because
15 SAMA letter is talking about getting the
16 approval from either Labor Ministry and
17 Social Affairs or from Islamic Ministry.

18 So we have -- you know, we
19 have -- we have these Islamic Ministry of
20 Islamic, you know -- before -- before the
21 noise started coming for Al-Haramain after
22 the closing of branches overseas, we have it
23 even years before.

24 Q. And, Mr. Al Rajhi, I'm just
25 trying to clear up some confusion in the

1 record because there's testimony indicating
2 that Al-Haramain Islamic Foundation operated
3 without a license or a permit, and am I
4 correct that the bank in 2004 received this
5 document from the Minister of Justice
6 indicating that Al-Haramain did, in fact,
7 have a permit?

8 A. Yes, we have -- for
9 Al-Haramain, this is letter there, but they
10 have letter also came from -- which is more
11 relevant to us. Yes, so that's confirming,
12 you know, there are -- you know, they are --
13 you know, they are working -- you know, they
14 are established in Saudi as they said that --
15 and they said, you know, here, it's more
16 general statements. You know, it has to work
17 according to the permit and talking to -- to
18 operate under the laws and regulation.

19 The other one is -- yeah, the
20 other one is more specific. It's talking
21 about that, you know, we can have an account
22 with them. And again, the second from SAMA
23 is talking about we should get it from one of
24 the -- you know, from at least two -- from
25 other two organization.

1 Q. Okay. So you -- in addition to
2 this document from the Minister of Justice,
3 you also had the letter from the Minister of
4 Islamic Affairs indicating that Al-Haramain
5 was, in fact, permitted, correct?

6 A. Yes, right.

7 Q. And I mentioned to you or you
8 testified before that your letter to the
9 Minister of Islamic Affairs included
10 reference to him as the general supervisor of
11 Al-Haramain because the bank had some
12 information indicating that he held that
13 role.

14 Correct?

15 A. Yes, some of -- yes.

16 (Al Rajhi Exhibit ARB 36 marked
17 for identification.)

18 QUESTIONS BY MR. CARTER:

19 Q. And if we can mark as the next
20 exhibit the document at Tab 10.

21 This is another document
22 Al Rajhi Bank produced in discovery dated
23 January 29, 1997. It appears to be a letter
24 from then deputy minister of Islamic Affairs
25 Saleh bin Abdul-Aziz bin Mohamed Al

1 ash-Sheikh to the director general of
2 Al Rajhi Banking.

3 Was that you at that time
4 period?

5 A. Which year was it? '97?

6 Yes -- yeah, '97, I was --
7 yeah, this is me.

8 Q. Okay. And so this was a
9 letter deputy -- that then Deputy Minister Al
10 ash-Sheikh sent to you, correct?

11 A. Yes, sent it to the bank and he
12 put -- he put my -- to the attention and to
13 the bank, yes.

14 Q. He addressed this to you,
15 correct?

16 A. Yes, at that time I was the
17 general manager, yes. But, I mean, it's not
18 personal. It's being sent to me as the
19 general manager of Al Rajhi Bank.

20 Q. Okay. But the -- the way that
21 he has addressed this is to you by title,
22 correct?

23 A. Yeah. Yeah, this is my title.
24 I was the general manager of Al Rajhi Bank,
25 so this is -- comes to me, but I just want to

1 clarify, came to me as the general manager of
2 Al Rajhi Bank, not to personal -- not to my
3 own name.

4 Q. Understood.

5 And in the letter he indicates
6 that it's fine to keep Al-Haramain Islamic
7 Foundation's account ■■■555/9 at your branch
8 number 166.

9 Do you see that?

10 A. Yes.

11 Q. Do you recall what prompted
12 this letter?

13 MR. CURRAN: Objection. Lack
14 of foundation.

15 You may answer.

16 THE WITNESS: Yeah, this is --
17 it seems the bank wanted to have --
18 you know, we asked that Al-Haramain to
19 bring us something that they can, you
20 know, show the government permission,
21 and we received this letter from
22 Al-Haramain.

23 QUESTIONS BY MR. CARTER:

24 Q. This refers to a specific
25 account at Al-Haramain.

1 Do you recall whether there was
2 any particular issue or concern with that
3 account?

4 A. No, I don't recall.

5 Q. And --

6 A. Maybe -- maybe this is the main
7 account for them. I'm not sure.

8 Q. And do you know how it came to
9 be that the Deputy Minister of Islamic
10 Affairs was the one who wrote to you to
11 confirm it was okay to keep that Al-Haramain
12 account open?

13 MR. CURRAN: Objection. Lack
14 of foundation.

15 THE WITNESS: So the question
16 was why he send this letter or --

17 QUESTIONS BY MR. CARTER:

18 Q. Yeah, why it came from him.

19 A. Because he's the deputy
20 minister.

21 (Al Rajhi Exhibit ARB 37 marked
22 for identification.)

23 QUESTIONS BY MR. CARTER:

24 Q. Okay. And if we can mark as
25 the next exhibit a document at Tab 9.

1 And, Mr. Al Rajhi, this is,
2 again, another document Al Rajhi Bank
3 produced in discovery dated September 26,
4 1998, again from then Deputy Ministry of
5 Islamic affairs, Al ash-Sheikh, and addressed
6 to the Director General of Al Rajhi Bank &
7 Investment Corp.

8 And again, at this time, that
9 was you, right?

10 A. Which date do we have? 2000,
11 yes. Sorry, what's the year we have here?

12 Q. The year is 1998.

13 A. '98, yes, this is -- I am the
14 general manager.

15 Q. Okay. And so this letter was
16 addressed to you, correct?

17 A. Yes, this is addressed to me.

18 Q. Okay. And in the -- in the
19 signature line for Deputy Minister of Islamic
20 Affairs, Saleh bin Abdul-Aziz bin Mohamed Al
21 ash-Sheikh, he refers to himself as the
22 general supervisor of the Al-Haramain Islamic
23 Foundation.

24 Do you see that?

25 A. Yes, I see it.

1 Q. And is it your understanding
2 that he was the general supervisory of
3 Al-Haramain at the time he sent this letter?

4 A. Well, this is what I -- you
5 know, this is what he put in his letter that
6 he's the general supervisor for Al-Haramain.

7 Q. And the letter was sent to you
8 on letterhead from the Al-Haramain general
9 supervisor's office, correct?

10 A. Yes, this letter from
11 Al-Haramain general supervisor.

12 Q. And the subject matter of the
13 letter is a request to transfer nine accounts
14 into the name of Al-Haramain Islamic
15 Foundation.

16 Do you see that?

17 A. Yeah, he's told -- he's saying
18 we're transferring the accounts of
19 Al-Haramain attached statements, which are
20 nine accounts in the name of Al-Haramain
21 Islamic Foundation.

22 So, yes. So he has a number of
23 accounts which is -- which is he wants to
24 transfer it to the name of Al-Haramain.

25 Q. Okay. And so he's writing to

1 request that the bank take action with regard
2 to certain accounts for Al-Haramain, correct?

3 A. Yes.

4 Q. And in the letter he advises
5 that the signatory authority for the accounts
6 should be limited to persons authorized by
7 Director General Sheikh Ageel bin Abdulaziz
8 Al-Aqil.

9 Do you see that?

10 A. Yes. Yes.

11 Q. So in this letter, you agree
12 that then Deputy Minister Al ash-Sheikh is
13 representing himself to be the general
14 supervisor of Al-Haramain and providing
15 direction to you concerning activities to be
16 undertaken as to Al-Haramain's banking
17 accounts, correct?

18 A. Yeah, his letter was -- is
19 saying that we will -- you know, you open
20 these accounts and the directors who can sign
21 this are -- that's what the letters say.

22 Q. So the letter is saying, I'm
23 the general supervisor of Al-Haramain, and I
24 want you to do some things with regard to
25 these nine accounts, correct?

1 A. Yes.

2 Q. Okay. And turning to the
3 attached pages that describe the accounts.
4 Is it -- is it your understanding that there
5 were nine accounts that had been opened in
6 the name of individual persons and then
7 Al-Haramain was asking them to be transferred
8 into the name of Al-Haramain?

9 MR. CURRAN: Objection as to
10 form.

11 THE WITNESS: I just see it
12 here.

13 You said -- no, it did not. It
14 did not say this here, these
15 individual accounts. This is the
16 Haramain accounts.

17 QUESTIONS BY MR. CARTER:

18 Q. Okay. Just -- do you recall
19 whether you were involved in facilitating the
20 request made in this letter?

21 A. No, most -- these things
22 normally doesn't come to me. It would be
23 done by the -- by the letter -- the relevant
24 people.

25 Q. So you were -- you were a bit

1 senior, I take it, to be receiving requests
2 to change the names of accounts?

3 A. Yes, normally changing
4 accounts, this will not come to me.

5 Q. Why is it that the minister
6 of -- or deputy Minister of Islamic Affairs
7 thought it appropriate to write to you?

8 A. I don't --

9 MR. CURRAN: Objection as to
10 form.

11 You may answer.

12 THE WITNESS: Yeah, I don't
13 know, you know. Maybe -- maybe
14 because of the title he has he thinks
15 he like to write to me as the general
16 manager, but I don't know.

17 But it's normal, you see
18 sometimes letter -- many letter, you
19 know, being addressed by different
20 customers, this is not to -- what they
21 believe the top man of the
22 organization. But this doesn't mean
23 that it will be handled by the GM or
24 the chairman of the board. It will be
25 handled by the right department. Even

1 that has been said.

2 That's not unusual for
3 customers or -- you know, they do this
4 kind of things. So maybe they want to
5 get more attention. Maybe this is --
6 I don't know. Could be another
7 reason.

8 QUESTIONS BY MR. CARTER:

9 Q. Okay. Do you recall when you
10 had any conversations or communications with
11 the deputy minister during this time period
12 indicating that he should write you in
13 relation to Al-Haramain?

14 A. No.

15 Q. Activity at the bank?

16 A. No.

17 (Al Rajhi Exhibit ARB 38 marked
18 for identification.)

19 QUESTIONS BY MR. CARTER:

20 Q. If we can mark as the next
21 exhibit the document at Tab 4.

22 And this is an October 17, 1997
23 letter also produced by Al Rajhi Bank. And
24 again, this is a letter from the deputy
25 Minister of Islamic Affairs, Saleh bin

1 Abdul-Aziz bin Mohamed Al ash-Sheikh,
2 correct?

3 A. Yeah. Can I see the Arabic
4 maybe?

5 Q. Sure.

6 A. Yeah, sorry, what was the
7 question?

8 Q. Okay. This is a letter from --
9 also from Deputy Minister Al ash-Sheikh?

10 A. Right.

11 Q. And this one issues on the
12 letterhead of Ministry of Islamic Affairs,
13 correct?

14 A. The letterhead, yes, it has the
15 Ministry.

16 Q. And in the signature line, the
17 deputy minister, again, refers to himself as
18 the general manager of the Al-Haramain
19 Islamic Foundation?

20 A. Yeah, that's what's being put
21 in this letter.

22 Q. And he additionally says in
23 this letter that Al-Haramain Islamic
24 Foundation is "working under our
25 supervision."

1 Do you see that?

2 A. Yes.

3 Q. And when he says "working under
4 our supervision," do you mean -- do you
5 understand him to have meant the supervision
6 of the Ministry of Islamic Affairs?

7 A. And I think, yes, this is --
8 for me, it looks like it's the supervision of
9 the ministry itself. I mean, I don't know.
10 I cannot -- I cannot confirm this, but it
11 could be this meaning. It could be other
12 meaning. It's not clear, you know, words for
13 me. I cannot give a definite answer.

14 Q. As the bank obviously somehow
15 received this letter and as a recipient, do
16 you agree the bank's understanding would have
17 been that Al-Haramain was working under the
18 supervision of the Ministry of Islamic
19 Affairs?

20 MR. SHEN: Objection to form.

21 THE WITNESS: Mr. Carter, this
22 letter is not -- is not being sent to
23 the bank. This is maybe the bank --
24 it's being sent to the passport
25 office.

1 QUESTIONS BY MR. CARTER:

2 Q. I see that, and I wanted to ask
3 you a question about that.

4 Do you understand how this came
5 to be in the possession of the bank?

6 A. No, I don't -- no, I don't -- I
7 did -- yeah, this must -- most likely is
8 being given by Haramain to -- you know, to
9 the bank. They wanted the bank to know that
10 they are -- you know, they are -- they have
11 the permission from Ministry of Islamic to
12 operate. That's -- that's what it come in my
13 mind.

14 Q. And do you -- is there any way
15 to tell from the document when the bank
16 received this letter?

17 A. I see the dates in the
18 signature, 18/6 and 16/6. So that's --
19 according to Hijri, October 1997.

20 Q. Well, that's when the letter
21 was sent --

22 A. Yeah.

23 Q. -- to the director of the
24 Riyadh Passports Administration.

25 Is there any marking on the

1 letter that tells you when it came into the
2 possession of Al Rajhi Bank?

3 A. No, I don't see it.

4 Q. Do you know whether there was
5 ever any effort by employees at the bank
6 subsequent to September 11, 2001, to request
7 that Al Rajhi Bank provide earlier
8 correspondence documenting its relationship
9 with the Ministry of Islamic Affairs?

10 A. What do you mean by the
11 documenting the relationship? I don't
12 understand, please.

13 Q. Do you know whether anyone went
14 to Al-Haramain after 9/11 from the bank to
15 request that Al-Haramain to provide copies of
16 earlier documents that would show that the
17 bank was operating with a permit and
18 supervised by the Ministry?

19 A. I'm not aware of anyone of the
20 bank agrees there or not.

21 (Al Rajhi Exhibit ARB 39 marked
22 for identification.)

23 QUESTIONS BY MR. CARTER:

24 Q. And if we can mark the next
25 exhibit the document at Tab 5.

1 This is another document that I
2 am provided in discovery, and I understand
3 it's an Al Jazeera Arabic news article
4 relating to the employment of Deputy Minister
5 Al ash-Sheikh as general supervisor of
6 Al-Haramain.

7 Do you -- do you know how this
8 article came into the possession of Al Rajhi
9 Bank?

10 A. I need to look at it.

11 So this is -- what's the date
12 here?

13 Q. It's a 1997 article.

14 A. Yes. Yeah. Okay.

15 Q. And you had a chance to look at
16 it?

17 A. Yes.

18 Q. And do you agree that the
19 article discusses the assignment of deputy
20 Minister of Islamic Affairs Al ash-Sheikh to
21 supervise Al-Haramain Foundation?

22 A. Yeah, this is what the article
23 say, that, you know -- that's what the
24 article say.

25 Q. And --

1 A. Let me just scroll. You know,
2 so he talking here, he's the deputy minister.
3 Yeah, then he said, yeah, according to this
4 article, that he said he has been assigned to
5 a supervise Al-Haramain. That's what --

6 Q. And again, do you know -- do
7 you know how this article came to be in the
8 possession of Al Rajhi Bank?

9 A. No, I don't know. I'm actually
10 surprised -- no, I didn't know how it get to
11 the bank.

12 Q. Did the bank have any protocol
13 in place during the 1997 time period to
14 collect media articles concerning prominent
15 depositors?

16 A. Well, I --

17 MR. CURRAN: Objection as to
18 form. Lack of foundation.

19 You may answer.

20 THE WITNESS: Yeah, you know, I
21 think the bank normally, you know,
22 it's a good practice, any -- any news
23 information about customer, then, you
24 know, you -- you keep it to the
25 customer file. So this must be coming

1 from that.

2 QUESTIONS BY MR. CARTER:

3 Q. This is -- I think you're
4 correct, that this is likely from the
5 customer information file.

6 Is that -- is that your
7 expectation based on the way the bank
8 maintains records?

9 A. Yes. Yeah, that's my
10 expectation of it.

11 (Al Rajhi Exhibit ARB 40 marked
12 for identification.)

13 QUESTIONS BY MR. CARTER:

14 Q. And if we can mark as the next
15 exhibit, the document at Tab 6.

16 And this is a 1999 circular to
17 all government administrations, centers,
18 companies and banks that was produced by
19 Al Rajhi Bank dated June 1, 1999.

20 Do you see that?

21 A. Yeah. This is coming from --
22 from Yanbu, governor of Yanbu, yes.

23 Q. Okay. This is a letter from
24 the governor of Yanbu, Ibrahim bin Shakhbut
25 al Sultan, correct?

1 A. Yes.

2 Q. And the letter issued on the
3 letterhead of the Ministry of Interior,
4 correct?

5 A. Yeah, well, from Medina --
6 Medina, you know, governor of Medina which is
7 Yanbu, a town in Medina. But it went to
8 Ministry of Interior because all -- all
9 different governors report to the Ministry of
10 Interior.

11 But this is from Yanbu, Yanbu,
12 on behalf -- Yanbu -- it does say. I don't
13 know for sure, but it's Yanbu is part of the
14 Medina district, so this is from their mayor
15 or whatever you call it.

16 Q. And this concerns the opening
17 of an Al-Haramain Foundation office in that
18 province, correct?

19 A. Yes, this is talking about
20 opening a branch in Yanbu city.

21 Q. And in the letter the governor
22 of the province represents the Foundation is
23 supervised by Deputy Minister of Islamic
24 Foundation, Endowments, Da`Wah and Guidance,
25 His Eminence Sheikh Saleh bin Abdul-Aziz Al

1 ash-Sheikh, correct?

2 A. Yeah, that's what he said in
3 his letter.

4 Q. And the governor of Yanbu at
5 this time in June of 1999 closes by asking
6 recipients to please cooperate with the
7 Foundation in everything concerning -- that
8 serves the common good, correct?

9 A. Yes.

10 Q. And what, if any, significance
11 would Al Rajhi Bank have ascribed to that
12 request in the 1999 time period?

13 A. What Al Rajhi did with this
14 letter?

15 Q. Yeah, what would be the
16 significance of this letter from the bank's
17 perspective?

18 A. I think -- I think they just --
19 this is opening account for this branch in
20 Yanbu with Al Rajhi bank with that branch, I
21 would assume. Again, I can't recall, but
22 that's what could be.

23 Q. Did you know Governor Ibrahim
24 bin Shakhbut al Sultan during this time
25 period?

1 A. No, I don't know him.

2 (Al Rajhi Exhibit ARB 41 marked
3 for identification.)

4 QUESTIONS BY MR. CARTER:

5 Q. And finally on this topic, can
6 we mark the letter at Tab 8.

7 Again, this is a letter that
8 Al Rajhi Bank produced to us dated June 7,
9 1999, from the Prince of Tabuk, Fahd bin
10 Sultan Abdul Aziz and addressed to His
11 Eminence Sheikh Abdulaziz bin Mohamed Al
12 ash-Sheikh, deputy Minister of Islamic
13 Affairs and General Supervisor of Al-Haramain
14 Islamic Foundation.

15 Do you see that?

16 A. Sorry, this is a letter from
17 where? From -- I can't read here in --
18 ministry of -- I can't -- I can't see -- it's
19 a court. Maybe this is coming from Supreme
20 Court in Tabuk. And the top there is
21 Ministry, but illegible. What does that mean
22 by "illegible"?

23 MR. CURRAN: That means that
24 the translator couldn't figure out
25 what it said.

1 THE WITNESS: Okay. Okay.

2 They could not find. So they said in
3 Supreme Court -- I can't read it on
4 here, but here in English, I can see
5 Supreme Court in Tabuk.

6 And this is being sent to
7 Abdul-Aziz bin Mohamed Al ash-Sheikh.
8 So this is what -- we're talking about
9 different individual here?

10 QUESTIONS BY MR. CARTER:

11 Q. The author --

12 A. I --

13 Q. So it's addressed to the deputy
14 Minister of Islamic Affairs and General
15 Supervisor of Al-Haramain, correct?

16 A. Yes. No, I don't know
17 because -- sorry, the name -- the name is not
18 correct. Abdul-Aziz, not correct.

19 Q. And it looks like someone
20 potentially left out the Saleh bin
21 Abdul-Aziz, correct?

22 A. It could be.

23 Q. Okay. But again, this is a
24 letter indicating that an official of the
25 Ministry of Islamic Affairs is also the

1 general supervisor of Al-Haramain?

2 A. Yeah, that -- again, here --
3 yeah, that is this title.

4 Q. And this came from Prince of
5 Tabuk, Fahd bin Sultan Abdul Aziz.

6 Do you know who that is?

7 A. This is -- no, I can't --
8 Prince of Tabuk. So this must be -- yeah,
9 this is -- yes. Well, here it's Prince Fahd
10 bin Sultan Abdul Aziz. He's Tabuk -- Prince
11 of Tabuk, head of Tabuk affairs.

12 Q. Okay. So this came, as you
13 understand it, from the head of the
14 governance in Tabuk, correct?

15 A. Yeah. Well, this is what
16 suggests this letter. You know, this is --
17 if this is accurate -- if it is correct, this
18 is what's written here.

19 Q. And you -- again, do you have
20 any understanding how this came to be in
21 Al-Haramain's files or when it came to be --
22 or I'm sorry.

23 Do you have any understanding
24 of how this came to be in the bank's files
25 or --

1 A. No, I don't know. This is, it
2 seems, you know, a letter sent to the
3 prince -- but I don't know how it came to the
4 file -- came to the bank files. So it seems,
5 you know, our branches or something they get
6 a copy of this and they want to keep it in
7 the customer file.

8 Q. But based on all of those
9 documents, do you agree it would have been
10 the understanding of Al Rajhi Bank that the
11 deputy Minister of Islamic Affairs at that
12 time was the general supervisor of
13 Al-Haramain?

14 MR. SHEN: Objection to form.

15 THE WITNESS: Yeah, again, I'm
16 not in a position to agree or not
17 agree, but what I can say that all the
18 letter -- you know, the letter came to
19 us, had that title.

20 Now, what does it mean for
21 them, it's not -- I cannot -- I think
22 they should speak to themselves.

23 MR. CARTER: Chris, can we take
24 just maybe a two- to five-minute
25 break?

1 MR. CURRAN: Sure.

2 MR. CARTER: Okay.

3 VIDEOGRAPHER: Off the record.

4 6:04 p.m.

5 (Off the record at 6:04 p.m.)

6 VIDEOGRAPHER: On the record.

7 6:12 p.m.

8 (Al Rajhi Exhibit ARB 42 marked
9 for identification.)

10 QUESTIONS BY MR. CARTER:

11 Q. Mr. Al Rajhi, we've been
12 speaking a bit about the bank's interactions
13 with Al-Haramain Islamic Foundation.

14 And if we can, I would like to
15 mark as the next exhibit the document at
16 Tab 22.

17 A. The Arabic.

18 Yes, I see it here.

19 Q. Okay. And again, this is a
20 document produced to us by Al Rajhi Bank, and
21 it appears to be a letter from the Director
22 General of Al-Haramain, Aqeel Al-Aqil,
23 addressed to you.

24 Is that correct?

25 MR. CURRAN: Objection as to

1 form.

2 You may answer.

3 THE WITNESS: Yes. Yeah, the
4 general manager of Al Rajhi Bank,
5 which is me at that time.

6 QUESTIONS BY MR. CARTER:

7 Q. And the date of this letter is
8 September 9, 1999, correct?

9 A. Yes, that's what I see it in
10 the translation.

11 Q. And the subject matter of this
12 letter is a request to transfer an account at
13 Al Rajhi Bank into the name of Al-Haramain
14 Islamic Foundation instead of being under the
15 name of the Office Director Sheikh Zayd bin
16 Mohamed al Harithi.

17 Do you see that?

18 A. Yes, I see it.

19 Q. First, do you understand or
20 have any understanding why Al-Haramain
21 Director General Ageel Al-Aqil addressed this
22 letter to you?

23 MR. CURRAN: Objection as to
24 form.

25 You may answer.

1 THE WITNESS: I think this is
2 the same one before. Normally this
3 doesn't come to my office. I don't
4 handle it. Go to the branch most
5 likely or will be someone in the head
6 office send directly to the branches.

7 And as I maybe said before, you
8 know, it's not usual for many
9 customers when they write a letter,
10 you know, they write to the top
11 person, executive, at that
12 organization.

13 QUESTIONS BY MR. CARTER:

14 Q. I'm sorry, do you think it was
15 common for routine customers --

16 A. No. No, I wouldn't say common
17 or routine. I'm saying it's not unusual to
18 see some customers they do that, but I
19 wouldn't say it's common.

20 Q. Did you know Ageel Al-Aqil
21 during this time period, 1998 to 2002?

22 A. No, I didn't know him.

23 Q. Do you recall whether you ever
24 had occasion to meet him at any point at the
25 end of 2002?

1 A. No, I didn't. Even if I see
2 him now, I don't know him, so I don't know
3 even now how he looks.

4 Q. Do you recall -- do you recall
5 whether your father Sulaiman al Rajhi knew
6 Aqeel Al-Aqil during this time period?

7 A. Well, let me -- for me as I
8 said, you know, I didn't -- I didn't recall
9 that we say, use this word -- and for my
10 father, I'm not aware if he knows him or not.

11 Q. And I'm sorry, do you recall
12 whether or not you had any occasion to meet
13 him prior to this time period?

14 A. I --

15 MR. CURRAN: Objection as to
16 form.

17 THE WITNESS: No, I don't
18 recall.

19 QUESTIONS BY MR. CARTER:

20 Q. But in this case, he does
21 address his letter to you relating to the
22 name change for this account, correct?

23 MR. CURRAN: Objection as to
24 form.

25 You may answer.

1 THE WITNESS: Yeah, the letter
2 here is being sent to me, right. But,
3 again, mostly like -- not most likely.
4 Normally I don't see these kind of
5 requests. It doesn't come to my
6 office, to my attention.

7 QUESTIONS BY MR. CARTER:

8 Q. And if it were addressed to
9 you, do you know whether or not you would
10 have actually read this letter?

11 A. No, if it doesn't come to my
12 office. Because as I said, again, you know,
13 I -- I don't -- I now see the letter, but I
14 don't recall anything about it.

15 But if this letter comes --
16 goes to the branch, for example, the branch
17 would send it to his supervisor and deal with
18 it rather than he send it to me or his
19 supervisor. He doesn't need to send it to
20 me. He just deal with it in the right level
21 in the organization.

22 So this doesn't -- this doesn't
23 mean me as the general manager to do anything
24 about it.

25 Q. At the -- near the bottom of

1 the letter, there is a fax masthead.

2 Do you see that?

3 A. So it was this fax, yeah. It
4 looks.

5 Q. And --

6 MR. CURRAN: Objection as to
7 form.

8 You may answer.

9 THE WITNESS: So what's the
10 question?

11 QUESTIONS BY MR. CARTER:

12 Q. Can you move down further on
13 the version up here?

14 Okay. And can you highlight
15 there what I understand to be a fax
16 transmittal?

17 A. Yes.

18 MR. CURRAN: Look at the
19 original Arabic because it's got more
20 than is shown on the translation.

21 THE WITNESS: Yeah.

22 QUESTIONS BY MR. CARTER:

23 Q. Do you recognize the fax number
24 that appears at the bottom of this?

25 A. No, I don't recognize it.

1 Q. Okay. And on the basis of this
2 letter -- I'm sorry, there are various cc's
3 on the letter, the Taif Office for follow-up,
4 interior committee, financial affairs and to
5 the office in Emad.

6 Do you see those?

7 A. Yes, I see it.

8 Q. Okay. And are those internal
9 Al Rajhi Bank notations? Or are those
10 Al-Haramain notations?

11 A. This, for me, it looks like
12 these could be for different -- for
13 Al-Haramain Foundation, not for the bank.

14 Q. And on the face of this letter,
15 it indicates that there is an account at the
16 bank under the name of an individual that is
17 being changed to the name of the Foundation.

18 Correct?

19 A. Yeah, I think from what I read
20 here, they -- you know, the Foundation wanted
21 to transfer account from name of individual
22 to the name of Al-Haramain.

23 Q. And during this time period,
24 would it have been proper for Al-Haramain to
25 be conducting business through an account

1 held in the name of an individual person?

2 MR. CURRAN: Objection as to
3 form. Lack of foundation.

4 You may answer.

5 THE WITNESS: Yeah, this is --
6 I don't know about it. This is
7 Al-Haramain, the way they do their
8 things.

9 But -- but, I mean, they have
10 the -- but I think from the bank point
11 of view, this is coming to the bank,
12 you know, the -- the name of the
13 individual and the charity say, we
14 want to change this account from
15 individual account to charity account.
16 So I think the bank, what normally
17 would do will apply its own protocol
18 and controls and get whatever
19 documentation they need.

20 And -- and if -- you know, in
21 order to transfer you, he would have
22 applied his external controls so he
23 needs to be normally, I would assume,
24 checked by maybe the legal department
25 and also some authority to approve it.

1 And, you know -- and in this
2 case, you know, as you know if I
3 know -- if someone came to me and said
4 that, okay, I'll come to the bank
5 saying, I want to change from --
6 account from individual to charity, I
7 think this is -- this is -- means
8 that, you know, you have more control
9 under account when it's a charity
10 rather than it's in an individual
11 name.

12 QUESTIONS BY MR. CARTER:

13 Q. And just as a general matter,
14 though, during this time period based on your
15 understanding of the protocols in place at
16 the bank, would it have been appropriate for
17 Al-Haramain to operate an account that was
18 held in name of one of its individual
19 officials rather than in the name of
20 Al-Haramain itself?

21 MR. CURRAN: Objection. Lack
22 of foundation.

23 You may answer.

24 THE WITNESS: Yeah, again, you
25 know, this is Al-Haramain. And for

1 me, of course, if we knew at that time
2 they come with that account for
3 Al-Haramain, we wouldn't accept that
4 to be opened in the name of the
5 individual.

6 So as a bank, you know, we
7 would -- you know, we would -- we
8 would not open account for individual
9 if we know it's not for something.

10 But if he comes to me both to
11 say, I want to change this account now
12 to a charity, this is where, you know,
13 we -- we -- we check it, we --
14 normally the bank would have higher
15 authority approval, and this is --
16 give us more monitoring and control
17 for the activity in this account if it
18 is in the name of the charity than if
19 it is in the name of an individual.

20 QUESTIONS BY MR. CARTER:

21 Q. And if the bank received notice
22 during this time period that Al-Haramain was
23 operating accounts in the name of individual
24 persons, based on your understanding of the
25 bank's protocols, what should have been done?

1 MR. CURRAN: Objection as to
2 form.

3 You may answer.

4 THE WITNESS: Yeah, you know,
5 the -- you know, the bank, you know,
6 it deals with the request of the
7 customer and deal with it and try to
8 correct it. That's -- the bank just
9 wants to make sure if this is -- you
10 know, if he knows about it since now
11 this letter came, I would assume --
12 because again, these things I don't
13 see it normally. This is seen by the
14 legal department, by higher authority,
15 and they would do the right, you know,
16 protocol to do this.

17 But, again, if -- if we know
18 about it, our responsibility or our
19 job to make sure that this is -- you
20 know, we make the change after making
21 sure that all -- you know, all the
22 paper are signed by both the
23 individual, by the charity, by -- and
24 then protecting the customers,
25 protecting the bank and then, you

1 know, we will -- and then of course we
2 will apply what needed to be apply in
3 controlling the charity or monitoring
4 the charity account.

5 (Al Rajhi Exhibit ARB 43 marked
6 for identification.)

7 QUESTIONS BY MR. CARTER:

8 Q. If we can mark as the next
9 exhibit the Document Number 20.

10 And this is another letter from
11 Aqeel Al-Aqil addressed to you by title just
12 about a month later on October 13, 1999.

13 Do you see that?

14 A. So -- yes, yeah. This is
15 similar to the other one.

16 Q. Okay. So this is -- you agree
17 this is another instance where Al-Haramain is
18 asking for an account that's held in the name
19 of individual people to be changed into the
20 name of Al-Haramain, correct?

21 A. Yes, this is correct.

22 Q. And again, given that this is
23 the second request of this nature within a
24 month, you know, what in your view should the
25 bank have done in response to these

1 communications indicating that Al-Haramain
2 was using accounts in the name of
3 individuals?

4 MR. CURRAN: Objection as to
5 form.

6 You may answer.

7 THE WITNESS: You know, again,
8 you know, I don't know about the
9 details of these things. You know,
10 I'm not familiar with -- with these,
11 but I don't know. It could be. I'm
12 not saying this is the case, but it
13 could be the bank, you know, not just
14 some -- some -- if this is coming at
15 the same time. Some charity or some
16 activities in these accounts and the
17 bank who approached Al-Haramain and
18 said, you know, this need to be
19 corrected.

20 And I'm not saying this is the
21 case because I didn't know about it, I
22 haven't seen it. But the bank, that's
23 what's their job, you know, if they
24 see an account which is not -- you
25 know, approach the customer and they

1 ask him to do -- to correct it and
2 make it in the name of the charity.

3 And as I said before, you know,
4 we -- we apply the best compliance.
5 We -- we have our own monitoring for
6 the account and find anything
7 suspicious, that actually we report
8 it.

9 You know, this -- you know, you
10 see -- but at the same time, I'm not
11 in a position, you know, to go and to
12 close charity account without getting
13 approval from SAMA.

14 So that's -- you know, so for
15 me, you know -- you know, when they
16 see these things, I can't talk to the
17 client, I can't ask them to go and
18 change. Maybe I can't report it in
19 some cases. Again, I don't know
20 what's happened in this case because
21 I'm not aware of the details, and I
22 just believe myself it could be --
23 now, when I see these two things
24 happening that close to each other, it
25 could be -- it could be -- I'm not

1 saying this is the fact.

2 This is the bank who -- who
3 approached Al-Haramain that said, you
4 know, you need -- you need to collect
5 it and the bank received this letter
6 as a -- as a response to the bank
7 request.

8 QUESTIONS BY MR. CARTER:

9 Q. You do agree with me, though,
10 that it would be -- it was improper under the
11 bank's own regulations for Al-Haramain to be
12 operating accounts that were -- using
13 accounts held in the name of individual
14 people to carry out its financial activities?

15 MR. CURRAN: Objection --

16 THE WITNESS: Yeah.

17 MR. CURRAN: -- to the form.
18 Lack of foundation.

19 THE WITNESS: Yeah, I agree
20 with you, but, again, what can I do as
21 a bank? It's talking to the client,
22 you know, and trying to fix it and
23 rectify it. That's what the bank
24 would do. Because that's what --
25 that's in my hand to do with the

1 client. So -- which is, again, I'm
2 not sure if the bank did it or not.
3 As I said, I'm not aware of what did
4 happen.

5 If we know about something like
6 this, then we will -- you know, we
7 will go on to the -- to the Foundation
8 to ask them to rectify it.

9 (Al Rajhi Exhibit ARB 44 marked
10 for identification.)

11 QUESTIONS BY MR. CARTER:

12 Q. If we can mark as the next
13 exhibit Number 24. This is another internal
14 letter concerning this account name change
15 request. Again, it was produced by the bank.
16 It's from the director of Al Arbaeen -- Al
17 Arbaeen Street Branch to the head of legal
18 affairs and dated November 13, 1999.

19 Do you see that?

20 A. Yes. So this also confirm what
21 I said, the letter, they send it to my name.
22 It was -- it went to the branch, and the
23 branch acted on that letter even as -- you
24 know, addressed to the general manager and to
25 the legal department asked their -- for their

1 guidance.

2 Q. So is your understanding that
3 the request submitted in the letter addressed
4 to you concerning this account ■■■000/7 was
5 referred to the branch manager, correct?

6 MR. CURRAN: Well, objection as
7 to form.

8 You may answer.

9 THE WITNESS: Yeah, I'm just
10 saying that I assume from the name
11 here, I did not check, you know, the
12 account number here, but I assume it's
13 the same one, we have seen it before,
14 the same account. And that account,
15 what you showed you before, a letter
16 came, you know, from Al-Haramain this
17 to the general manager. And now I see
18 who has acted on this letter is the
19 branch manager.

20 So my understanding that, you
21 know, this letter was in the branch
22 and the branch, you know, based on
23 this letter, okay, is sent to the head
24 of legal department.

25

1 QUESTIONS BY MR. CARTER:

2 Q. And by sending the letter, he's
3 asking for the opinion of the legal
4 department about the request to change
5 account ■000/7 from the name of these
6 individuals into the --

7 A. Right.

8 Q. -- name?

9 A. Right.

10 Q. You know, and on the basis of
11 that, do you agree that this name change
12 initiative did not happen at the urging of
13 the bank but instead was initiated by
14 Al-Haramain?

15 A. Yes, I agree with you.

16 Q. And in the closing paragraph --
17 the second to last sentence of the letter,
18 the director of the Al Arbaeen Street Branch
19 notes that "the clients are recognized for
20 their charity work and commitment and
21 Al-Haramain Islamic Foundation is a
22 distinguished client to the company's branch
23 number 161 in Riyadh."

24 Do you see that?

25 A. These clients are recognized

1 for their charity and commitment, and that
2 Al-Haramain -- yes, I see it.

3 Q. Okay. And he includes that in
4 the concluding section of the letter
5 requesting the legal department's views on
6 whether or not the name change request can be
7 facilitated, correct?

8 A. Right.

9 (Al Rajhi Exhibit ARB 45 marked
10 for identification.)

11 QUESTIONS BY MR. CARTER:

12 Q. And if we can turn to the next
13 exhibit we'll mark at Tab 25. This is an
14 additional letter relating to this same
15 account dated November 16, 1999, that is
16 written by the head of legal affairs, Soliman
17 bin Mohamed al Rishan on November 18, 1999.

18 Correct?

19 A. Just I want to read to -- in
20 that case.

21 Yes.

22 Q. Okay. And the opinion of the
23 head of legal affairs is that under the
24 manual, the normal protocol if the client
25 wants to change the name of an account from a

1 personal account to a legal person's account,
2 is to close the old account and open a new
3 account.

4 Correct?

5 A. Yes.

6 Q. And so Al-Haramain was seeking
7 a departure from the bank's normal protocols
8 in this circumstance, correct?

9 MR. CURRAN: Objection as to
10 form.

11 You may answer.

12 THE WITNESS: So what was the
13 second point?

14 QUESTIONS BY MR. CARTER:

15 Q. Al-Haramain was requesting a
16 departure from the normal procedure for
17 transferring an account in the name of a
18 person into a legal entity?

19 A. No, I wouldn't call it a
20 departure, departure from the client. You
21 know, it's -- you know, some clients, even
22 individuals sometimes, will be -- they want
23 to -- they want to change and keep the same
24 account for whatever reason.

25 So, you know -- so there is

1 two problems. The way I see it, you know,
2 the data -- the way that close and open
3 account, but if the customer wanted to have
4 the same number account, this protocol been
5 explained here by the legal department that
6 could be applied to do that.

7 (Al Rajhi Exhibit ARB 46 marked
8 for identification.)

9 QUESTIONS BY MR. CARTER:

10 Q. If we can mark as the next
11 exhibit the document at Tab 28.

12 And this is another letter from
13 Aqeel Al-Aqil dated September 10, 2000. This
14 one is directed to the branch director, and
15 it concerns changing four accounts that are
16 held in the name of individual persons to
17 Al-Haramain accounts.

18 Do you see that?

19 MR. CURRAN: Objection as to
20 form.

21 You may answer.

22 THE WITNESS: Yeah, I see --
23 I'm not sure about, but I see -- I
24 don't know about account because
25 almost the same names.

1 QUESTIONS BY MR. CARTER:

2 Q. The account numbers referenced
3 are different from the account number we've
4 been discussing, correct?

5 A. Yeah, again, I don't remember
6 that, the number account, but they are the
7 same individuals having maybe more than one
8 account, if this is different account. So
9 they're having more than one account, and
10 this is also to fix it another account.

11 Q. So the prior letter concerning
12 the account ■000/7 involving these
13 individuals, that request is submitted
14 October of 1999.

15 This is nearly a year later and
16 concerns the existence of four other accounts
17 in the name of those individuals and a
18 request to transfer those as well into the
19 name of Al-Haramain.

20 Do you agree?

21 A. Yes. Yes, I agree.

22 (Al Rajhi Exhibit ARB 47 marked
23 for identification.)

24 QUESTIONS BY MR. CARTER:

25 Q. And if we can mark as the next

1 exhibit the document at Number 29.

2 This is another letter produced
3 by the bank dated August 8, 2001, and it
4 involves transferring another account into
5 the name of Al-Haramain Islamic Foundation.

6 Do you see that?

7 A. Yes, I see it.

8 Q. And the handwritten note
9 included on this document is directed to the
10 Director of Companies Branches in the Central
11 Region and indicates that our client, Sheikh
12 Aqeel bin Abdul-Aziz Al-Aqil wants to
13 transfer account number [REDACTED]/9666 from his name
14 to be named Al-Haramain.

15 Do you see that?

16 A. Yes, I see it.

17 Q. And so this is another request
18 for accounts held in the names of individual
19 people to be transferred to Al-Haramain now
20 in August of 2001, correct?

21 A. Yes, it is correct.

22 Q. So over the course of several
23 years, the documents the bank has produced
24 reflected there were numerous occasions in
25 which Al-Haramain represented to the bank

1 that accounts that were held in the name of
2 individuals should be transferred over to the
3 name of Al-Haramain, correct?

4 MR. CURRAN: Objection as to
5 form. Lack of foundation.

6 You may answer.

7 THE WITNESS: Yes. I agree
8 that this is a number of accounts
9 being transferred to individual names
10 to -- to Al-Haramain.

11 And again, you know, when
12 it's -- you know, when we know about
13 it, when they come, both, you know,
14 the individuals and the charity, to
15 the bank and then -- and telling the
16 bank, this is -- you know, this is --
17 these accounts are opened
18 individually. Because we open account
19 individually, we cannot know whether
20 this -- you know, has to do anything
21 with Al-Haramain.

22 So when he said, okay, now I'm
23 coming and they want to change it, the
24 bank -- the bank, you know -- the
25 responsibility in this case to

1 apply -- it is the protocol if they
2 want the customer to keep the same
3 account, you know, asking or getting
4 the right signature from, you know,
5 both party.

6 And again, this is -- you know,
7 this is another way. It's not taking
8 charity names to individual names.
9 It's taking individual accounts to
10 charity, which means that, you know,
11 there they will have -- be under more
12 control.

13 I agree that it's not the best
14 practice from Al-Haramain to start
15 with these individual names. If it
16 was from day one, you know, for -- for
17 a charity account, but, again, the
18 bank, when we know about it, I think
19 what the bank did is the right thing
20 in terms of rectifying and correcting
21 these other things, keeping to the
22 individual accounts.

23 QUESTIONS BY MR. CARTER:

24 Q. Well, do you know whether if
25 after receiving multiple requests of this

1 nature the bank ever took action to insist
2 that Al-Haramain close any accounts it was
3 using that were held in the name of
4 individuals and operate solely from accounts
5 in its formal name?

6 A. I'm not -- I'm not -- I
7 don't -- I'm not aware about this. I don't
8 know if this is also that the bank -- you
9 know, one individual has seen this. You
10 know, this is -- if it comes -- if -- because
11 best of us -- coming and change account from
12 name to name, it is not something you see it.
13 It is not something, you know, you see it
14 here -- here we talk about individual to
15 charity.

16 But you will see a lot of
17 customers come to change from one name to a
18 different name, maybe from an individual name
19 to a company name or establishment name.

20 So of this type of request
21 coming, it's not unusual. Now, there's five,
22 six cases or four cases, I don't know how
23 many cases for Al-Haramain over period of one
24 year to two years, does anyone in the head
25 office notice this is -- and, you know, and

1 for him, it seems, you know -- again, today
2 we have 21 million customer accounts. Al
3 Rajhi Bank is taking over -- you know, more
4 than 40 percent of the transaction the bank
5 existed. So really huge bank, big bank, big
6 bank.

7 But again, talking about
8 period, which is systems are not as accurate
9 and as helping as it is today. So, you
10 know -- you know, what I can say, to the best
11 of my knowledge, the bank dealt with this
12 request not any different from getting it
13 from other customer's request to make a
14 change.

15 Q. So you view the way that the
16 bank handled these requests from what you can
17 see as being consistent with the way the bank
18 operated generally?

19 A. And I -- I think from what I
20 see from the legal department, it's -- the
21 bank prefer that, you know, close the
22 account, open an account. But if a customer
23 said I want to change account from -- let us
24 say if I have an account in my name as
25 individual and I want this account to

1 continue but to be under a new company name
2 and they have formed my new company, from
3 what I can see, you can -- you can -- you can
4 ask -- you can -- you know, you can follow a
5 certain protocol the bank has and the certain
6 documents to be signed by both party and the
7 bank will -- will offer this service. That's
8 a -- you know, this is 20 years. I don't
9 know the details of it. I'm not familiar how
10 it works because it doesn't come to me. But
11 this is the way I can say when I see -- when
12 I talk about when I see it now.

13 (Al Rajhi Exhibit ARB 48 marked
14 for identification.)

15 QUESTIONS BY MR. CARTER:

16 Q. And if we can mark as the next
17 exhibit the document at Tab 13.

18 This is, again, another
19 communication from Al-Haramain that was
20 produced by the bank, also from Ageel
21 Al-Aqil. This one is dated November 25,
22 2000, and appears to be addressed to you.

23 Is that correct?

24 MR. CURRAN: Objection as to
25 form.

1 THE WITNESS: Let me see it.

2 MR. CURRAN: Withdraw that
3 objection. I see it's addressed to
4 him by name.

5 THE WITNESS: Okay. Yes, I can
6 see.

7 QUESTIONS BY MR. CARTER:

8 Q. Okay. And that's addressed to
9 you by name, correct?

10 A. Yes, this letter is in my name.

11 Q. And, in fact, Aqeel Al-Aqil has
12 addressed this to you as the Honorable
13 Brother Abdullah bin Soliman al Rajhi,
14 correct?

15 A. Yes, this is what he put in his
16 letter.

17 Q. Isn't that familiar terminology
18 you're referring to?

19 A. No. I think he wanted to --
20 you know, his excellency, honorable brother,
21 I think it's -- you know, it's -- but it
22 doesn't -- no -- wait. In English, it's not
23 like this. In Arabic it's -- this is -- this
24 is -- I think it's a -- the translation is
25 not accurate.

1 Q. What do you think the
2 appropriate translation is?

3 A. As I said, you know -- you
4 know, his excellency, Abdullah is brother,
5 okay, you know, in Arabic, you know, 'akh,
6 you know, people address each other with the
7 word of brother.

8 Okay. So -- so this is -- he
9 said, you know -- excellency, brother, His
10 Excellency. I don't know. I think, yes, no,
11 no. I think it's just the same, but in
12 Arabic it was used as a normal. Now here it
13 looks like, you know, recognition, but it
14 is -- so this is -- I think he wanted to send
15 then this very nicely, but again, this letter
16 doesn't come to me. This is -- goes to
17 the -- normally come to the right department,
18 doesn't come to my office, and they deal with
19 it.

20 Q. But, again, you know, in this
21 case, you know, he for some reason decided to
22 address it to you, correct?

23 A. Yeah, he -- yeah, he decided
24 this one to address this one, yes.

25 Q. And it concerns the opening of

1 a new account for Al-Haramain, correct?

2 A. Right. Yes.

3 Q. And then there's handwriting

4 below. That says, "Very urgent. Please

5 approve opening the required account.

6 Kindest regards," and it's signed the

7 director of branches division, Dr. Mansour

8 bin Abdullah al Jarbu.

9 Do you see that?

10 A. Yes.

11 Q. Okay. Who was Dr. Mansour bin

12 Abdullah al Jarbu at Al Rajhi Bank in this

13 time period?

14 A. Well, from whatever -- here,

15 the director of branches division. So

16 he's -- he's the director of the branches.

17 Q. So is he in charge of all of

18 the branches?

19 A. Yes, this would be charge --

20 but also he has a boss to report to, which is

21 deputy general manager. So he's not -- you

22 know, he doesn't report to me directly. He

23 report to someone between me and -- I mean,

24 there was -- there would be someone between

25 him -- between him and the -- and the general

1 manager. There would -- there's another
2 individual with a title of deputy general
3 manager.

4 Q. Okay. But in terms of Dr. al
5 Jarbu's role at this time, he was not the
6 manager of a single branch; he had a role
7 directing the branches in general, correct?

8 A. Yeah. He's head office staff
9 sitting in the head office, and he has
10 supervision for all the branches.

11 Q. Okay. And did he report to
12 your deputy?

13 A. He report to my deputy, yes.

14 Q. And did his normal day-to-day
15 responsibilities involve opening accounts?

16 A. No, I'm not aware at that time
17 what exactly is his responsibility, but there
18 will be different people reporting to the
19 deputy general manager, you know. This must
20 be dealing with a certain -- certain request
21 from the branches come to him.

22 Q. And do you have any
23 understanding how this particular request
24 ended up being referred to him for action?

25 A. Well, I think, again, the only

1 way I see it is the branch send a letter to
2 him because this is -- he sent it to the
3 branch manager. So this letter either came
4 from the branch to him or came from someone
5 in the head office, including maybe my office
6 without I see it, you know, they just -- you
7 know, they just sent it to the right -- to
8 the proper -- the proper department to deal
9 with it. And it came to his desk or the
10 customers are having, you know, approached
11 him directly.

12 So I didn't know how, you
13 know -- I wouldn't know that -- how -- you
14 know, there's thousands of things like this,
15 maybe happens every week and every day. So
16 it would be difficult for someone to, you
17 know, guess what it could be, but it's
18 normal. You know, they ask for open an
19 account, it could go to the branch, could
20 come to someone in the head office and then
21 he authorize them to open the account.

22 And also I didn't know -- and
23 sometimes goes to the branch directly. So I
24 don't know in this case why, you know -- why
25 the head of the branch give this -- you know,

1 he dealt with it.

2 Q. The text of the letter, as we
3 can see, is addressed to you as Brother
4 Abdullah bin Soliman al Rajhi, and on the
5 face we know that ensuing action was taken by
6 the director of the branches division,
7 Dr. Mansour bin Abdullah al Jarbu, correct?

8 A. Yes, it is to me, and Jarbu has
9 dealt with it. Yes.

10 Q. And he describes the approval
11 for opening the required account is very
12 urgent, correct?

13 A. For opening account, yes. I
14 mean, this is -- again, if a customer -- if
15 someone called and want to open the account,
16 he will -- you know, he will move it toward
17 urgent. You know, customers want the account
18 to be opened.

19 So I -- you know, I -- I didn't
20 think this is, you know -- because of
21 Al-Haramain, how would we do it. Think --
22 you know, I don't know if we check if other
23 letter came to me he would also see -- any
24 customer want to open an account, you know,
25 you need to open it quickly.

1 Q. An account opening could be
2 handled at the branch level, correct?

3 A. Exactly right. This is where
4 I'm -- you know, I don't know why -- why
5 this -- now when I look at it again, I don't
6 know why they had to come because it could go
7 to the branch directly and open the account.
8 He doesn't need anyone in the head office to
9 go and -- so it see -- unless, you know, they
10 went to that branch and that branch, you
11 know, did not accommodate the request, and
12 they had to come to this -- to the head -- I
13 don't know. But normally they don't need to
14 come to the head office. They didn't need to
15 send this letter. You know, this is 2000,
16 you know, so...

17 Q. We spent some time talking
18 about various requests from Al-Haramain to
19 transfer accounts from the names of
20 individuals to the names of Al-Haramain, and
21 you'll recall that one of those requests
22 concerned an account in the name of Aqeel
23 Al-Aqil?

24 A. One of the account being
25 transferred, yes, in one of the ones, yes.

1 Q. Yeah. And Ageel was involved
2 in some of the other requests as well, you
3 recall? Making the requests?

4 A. Making -- this one is asking
5 for opening an account.

6 Q. Yeah, I'm talking about the
7 earlier ones about -- indicating that there
8 were accounts in the name of individuals that
9 need to be changed into Al-Haramain's name.

10 Do you recall that?

11 A. Yeah, I recall the letter sent
12 by him to change it from individual to the
13 charity account.

14 Q. And are you aware that the
15 discovery conducted in the litigation has
16 included discovery concerning accounts that
17 the bank maintained for Ageel Al-Aqil?

18 MR. CURRAN: Objection as to
19 form. Lack of foundation.

20 THE WITNESS: So -- so what was
21 the question?

22 MR. CURRAN: He's asking you
23 about the discovery in the litigation.

24 THE WITNESS: Yes.

25 Yeah, what -- so what's -- I

1 don't know.

2 QUESTIONS BY MR. CARTER:

3 Q. Are you aware that the bank has
4 produced records relating to accounts
5 maintained for Aqeel Al-Aqil?

6 A. No, I'm not familiar with the
7 details what's been -- which document being
8 sent part of the discovery.

9 (Al Rajhi Exhibit ARB 49 marked
10 for identification.)

11 QUESTIONS BY MR. CARTER:

12 Q. Okay. If we can, can we mark
13 as the next exhibit the document at Tab 11.

14 MR. CURRAN: And here is the
15 Arabic if that helps.

16 THE WITNESS: Okay. It's
17 different. This is --

18 MR. CURRAN: Mr. Carter, can
19 you confirm that the Arabic here is
20 for this document?

21 THE WITNESS: He has it on the
22 top. Okay. In this --

23 MR. CARTER: Personally, Chris,
24 I'm incapable of confirming that any
25 Arabic document is anything, so -- but

1 we can ask someone else if
2 necessarily.

3 MR. CURRAN: Do you think --
4 I'll ask the witness. Is this the
5 same document?

6 THE WITNESS: No. Here -- no,
7 I see a different -- a different --

8 MR. CURRAN: Different account.

9 THE WITNESS: Yeah, this is
10 Abdul Hamad and this is Aqeel Aqeel.

11 MR. CURRAN: The witness
12 believes there's a mismatch here,
13 Mr. Carter.

14 THE WITNESS: The Arabic one,
15 yes.

16 MR. CARTER: Okay. We're
17 working through this real quick. Hang
18 on one second, Chris.

19 Chris, we're going to take a
20 second. I think the witness is
21 correct that there was some mix-up and
22 the Arabic document attached doesn't
23 correspond to the translation. And
24 we're going to get that corrected.
25 Just give it one second.

1 MR. CURRAN: Sure.

2 COURT REPORTER: Sean, did you
3 want to go off the record?

4 MR. CARTER: Yeah, I think it
5 will just take a couple of seconds.

6 VIDEOGRAPHER: Off the record.

7 6:59 p.m.

8 (Off the record at 6:59 p.m.)

9 VIDEOGRAPHER: On the record.

10 7:05 p.m.

11 QUESTIONS BY MR. CARTER:

12 Q. Okay. Mr. Al Rajhi, I
13 apologize for that brief delay. As I
14 mentioned, we've received the account
15 statements from the bank for a few accounts
16 associated with Aqeel Al-Aqil, and I've
17 marked the statements for one of those
18 accounts as the next exhibit and ask if you
19 can look and tell me whether you recognize
20 that as a Al Rajhi Bank account statement.

21 MR. CURRAN: We're just opening
22 up, I guess, the new Exhibit 49. Or
23 the new Arabic part of it.

24 JON KNOWLES: Yes, sir.

25 MR. CURRAN: Okay.

1 THE WITNESS: Yeah, this is --
2 yes, this is -- this is a bank
3 statement.

4 QUESTIONS BY MR. CARTER:

5 Q. Okay. And if I understand
6 correctly, the second column from the left
7 reflects the date of the relevant activity?

8 A. The -- yes, you have the
9 date -- two dates.

10 Q. On the left, I have the Islamic
11 calendar date, and to the right of that I
12 have the Gregorian date?

13 A. Yes. Yeah, you're right.

14 Q. Okay. So the first entry here
15 corresponds to January 10, 1998?

16 A. January -- yeah, '98
17 January 10, yes.

18 Q. Okay. And this, you agree, is
19 an Al Rajhi account for Aqeel Al-Aqil?

20 A. Yes, that's how it looks. Yes.

21 Q. Okay. And paging to the end of
22 this exhibit, the final date for which we
23 have activity is April 15, 2002, correct?

24 A. This is 2015. No, I have --
25 yeah, 2015, right. Arabic 2015.

1 Q. No, I think the 15 refers to
2 the day, right? I think the sequence here is
3 the first two digits in the Gregorian is the
4 year, the second two is the month and the
5 last two is the day.

6 A. No, because you see it here,
7 the left -- the left one, the day, right?

8 MR. CURRAN: He's saying next
9 to year.

10 THE WITNESS: 2002. And then
11 15. Because the one -- okay. This is
12 the -- okay. Yes.

13 QUESTIONS BY MR. CARTER:

14 Q. Okay. So were we in agreement
15 that this account statement covers the period
16 January 10, 1998, through April 15, 2002?

17 A. Yes. That's in the top saying
18 this.

19 Q. And so the account was opened
20 and active at least throughout that period,
21 correct?

22 A. Yes.

23 Q. Okay. And am I correct that
24 the three columns to the left, the first --
25 on the furthest left is withdraws, the second

1 column in the middle is deposits, and the
2 column to the right reflects the resulting
3 account balance?

4 A. Medina --

5 MR. CURRAN: So I guess it's
6 the left side of the Arabic but it's
7 the right side of the --

8 THE WITNESS: Yeah.

9 MR. CURRAN: Yeah.

10 THE WITNESS: Yeah, one debit,
11 one credit, yes.

12 QUESTIONS BY MR. CARTER:

13 Q. Okay. And just going to second
14 page of this 41455, there are a series of
15 cash deposits into this account -
16 440,000-plus riyals, 676,000-plus riyals,
17 1.259 million riyals, 684,000 riyals, 690,000
18 riyals.

19 Do you see all of those?

20 A. Yes, I see it.

21 Q. And so just in this section,
22 this reflects very large cash deposits into
23 this account held in the name of Aqeel
24 Al-Aqil, correct?

25 A. Yes.

1 Q. And those continue on the next
2 page?

3 A. Yes. Now --

4 Q. And they continue still on the
5 pages that follow?

6 A. Is the date here? No. What's
7 the date here?

8 Okay. This is 2000. Yeah, I
9 can see here up to -- yeah, so I can see from
10 2000, after 2000, only the -- so it's almost
11 the account is not active since 2000, right?

12 Q. Yeah, there is -- there is some
13 credit card deductions after that point,
14 correct?

15 A. Yes.

16 Q. And those are carried out
17 through the account, right?

18 A. What's the --

19 Q. And there's a cash deposit in
20 February of 2001?

21 A. February 2001.

22 Q. So still --

23 A. 1,200 riyal. A very small
24 amount.

25 Q. Yeah.

1 So you agree with -- you would
2 agree that there were some very large cash
3 deposits into this account between the period
4 of 1998 and 2000?

5 A. '98 and maybe '99, yes. But
6 not 2000.

7 Q. And that included at one point
8 a single cash deposit of 1.259 million
9 riyals?

10 A. Yes.

11 Q. And quite a number of other
12 very sizeable.

13 And based on your account
14 statement, it appears that the total activity
15 in the account throughout this time period
16 involved deposits on the order of 19,848,000
17 riyals and withdrawals on the order of
18 19,790,000 riyals, correct?

19 A. Yes.

20 Q. And are you generally, given
21 your work in the banking industry, familiar
22 with the approximate riyal-to-dollar
23 conversion rate during this time period?

24 A. I believe it is the same rate
25 as today, that the 3 -- \$1, 3.175, yeah.

1 Q. 3.715?

2 A. 3.75.

3 Q. Oh, 3.75.

4 So a little under 3 riyals to
5 the dollar, correct? Or 4 riyals to the
6 dollar?

7 A. Yeah, under 4, yeah, one
8 quarter, yes, under four, yes.

9 Q. So this account in terms of
10 dollars during this 1998, 1999 or so period,
11 took in something on the order of \$5 million
12 in deposits and processed \$5 million in
13 withdrawals, right?

14 A. Yeah, it might be 5 million,
15 yes. I think -- yes, about 4 million, not 5
16 million. About 4 million. I think. Yeah,
17 divide 920 by 3.75.

18 Q. You know, when I divided the
19 19,790,501 riyals by 3.75, I get a little
20 north of \$5.279 million.

21 A. Okay.

22 Q. So a little more than
23 \$5 million.

24 And under -- do you know
25 whether under the bank's money laundering

1 protocols in place at the time the personnel
2 at the bank responsible for its anti-money
3 laundering practices were obligated to
4 monitor accounts to determine whether or not
5 the transactions were inappropriate for the
6 type of account?

7 A. Yes, this is -- these
8 statements going back to almost 25 years ago,
9 which is at that time cash transaction was
10 maybe revealed in the system. It's not like
11 today. I know when they look at today, it
12 looks like something strange, but at that
13 time it was -- you know, this country was
14 very much cash transaction country. And, you
15 know, if you -- you know, if you -- it's not
16 big amounts for -- for -- to see an account
17 having that much of money.

18 And also, again, it was
19 manual -- manual -- you know, the system was
20 not -- was not that strong as it is today.
21 And this is why also you can see that in the
22 early years most of these transaction and in
23 the last two years it was -- that could
24 become also from the bank notified the
25 customers or it could be, you know, the

1 customers -- so must -- something has
2 happened that we see that. I don't know what
3 it could be, because I don't have the details
4 that -- in the last two years, these big
5 transactions aren't there anymore. So
6 something has been done.

7 Q. Well, but you don't have any
8 actual knowledge that something was done;
9 you're just speculating based on the
10 activity?

11 A. Yes. Yes. No, definitely, I
12 don't know the details. I'm not -- what I
13 see, you know, in the first two years was big
14 amount and then in the last two years, the
15 amount became much, much lower. So I would
16 assume that something has been done.

17 Q. And when it denotes a cash
18 deposit, that is a deposit of physical money,
19 correct?

20 A. Cash deposits means cash, yeah.
21 Cash deposits.

22 Q. Okay. So physical money,
23 right?

24 A. Yes, physical money. Yeah.

25 Q. Okay. So if we're looking at,

1 for instance, page 41455 of this account
2 statement, which beginning with the second
3 entry on that page, which is the first cash
4 deposit on this page, through the bottom, it
5 spans a period of May 5th to May 16th.

6 So about 11 or 12 days, right?

7 A. Sorry, May -- May 5th -- let me
8 just go back. May 5th? You say -- which
9 year?

10 Q. May 5, 1999.

11 A. I see here generally -- what's
12 the number, please?

13 Q. I'm sorry, the number of the
14 page? 41455.

15 A. No. No.

16 MR. CURRAN: That was the one
17 above.

18 THE WITNESS: So that's
19 different -- because here we have the
20 dates. Where is the date here? It
21 doesn't show the date. We don't have.
22 Because there it's showing different
23 dates 4145.

24 Now, 41455 is about the period
25 of January 1, '98 to December 2002.

1 Okay. And then you have here the
2 March here, 15 March, right.

3 QUESTIONS BY MR. CARTER:

4 Q. And it's not March. Let's go
5 up and talk about the specific transaction
6 events, and the second event listed there is
7 a cash deposit of 440,792 riyals on May 5,
8 1999.

9 Right?

10 A. Yes. Yes.

11 Q. And the bottom one is May 16,
12 1999, and that's a cash deposit in the amount
13 of 402,576 riyals.

14 A. Okay. Yes.

15 Q. Okay. And so during this
16 period, you agree with me that this
17 concerns -- we're looking just at a period
18 from May 5, 1999, to May 16, 1999, so 11 or
19 12 days, right?

20 A. Yes, right.

21 Q. And during that time, there are
22 ten cash deposits made into Aqeel Al-Aqil's
23 account, right?

24 A. Right.

25 Q. And the smallest of those is

1 399,000 riyals, right?

2 A. The smallest is, yes, 399,000.

3 Q. Okay. Which is north of

4 \$100,000, correct?

5 A. Right.

6 Q. Okay. And the largest is

7 1.259 million riyals, correct?

8 A. 1.25, right.

9 Q. And that's north of \$300,000?

10 A. Yes, that's correct.

11 Q. And there are numerous other
12 cash deposits in the 400,000 riyal range and
13 in the 600,000 riyal range, right?

14 A. Yes, it's right.

15 Q. And each of the 400,000 cash
16 deposits is over \$100,000, and the 600 is
17 somewhere north of \$150,000, right?

18 A. Yes.

19 Q. And so during this period of
20 just 11 days, Aqeel Al-Aqil deposited in
21 physical cash millions of riyals into his
22 account, right?

23 A. Yes, that's right.

24 Q. Based on your understanding of
25 the bank's anti-money laundering protocols at

1 the time, should the deposits by Aqeel into
2 his personal account with this kind of cash
3 have triggered any sort of reporting
4 requirement?

5 A. Mr. Carter, if this is today, I
6 assure you this will -- you know, will ring,
7 you know, and something will be done about
8 it. But we're talking about 24 years ago.
9 And at that time, you know, it's -- it's
10 different the amount of cash. We're talking
11 about '99. It's -- you know, we are at that
12 time a very much cash transaction society.

13 Actually, if anything, the
14 government, the Central Bank and the banks,
15 including Al Rajhi Bank, we worked very hard
16 based on strategy, you know, the government
17 has to move the society from cash to be more
18 payment. And today we -- you know, today I
19 think one we are the most advanced -- I
20 wouldn't say most advanced, but very much
21 advanced in terms of, you know, making
22 payments go for -- you know, to get -- to get
23 away from the cash payment.

24 25 years ago -- and again, this
25 is not only, you know, Saudi. You know,

1 globally it was -- it was -- it was -- maybe
2 here we are more than maybe certain
3 countries, but many of countries in the
4 region, you know, that it was like this, it
5 was cash driven.

6 So I think if you look at the
7 number today and you ask question about
8 something we are in '23 or something happened
9 25 years ago, without, you know, considering
10 the difference in the time, I think this is
11 will not give the right picture. That's --

12 Q. That's what --

13 A. Yeah.

14 Q. You think --

15 A. Go ahead.

16 Q. You think the difference in
17 time explains the value of the transactions
18 or the fact that he was operating in cash?

19 MR. CURRAN: Objection as to
20 form.

21 THE WITNESS: No, I think it's
22 operating in the cash more. Of course
23 the value has a difference, but a
24 small operating -- it's about
25 operating in cash, not about the

1 value. You know, operate --

2 QUESTIONS BY MR. CARTER:

3 Q. Even in -- sorry.

4 Even in a cash society, someone
5 depositing into their personal account what
6 looks to be about 6 million riyals in the
7 course of a handful of days would have been
8 unusual in 1999, wouldn't it?

9 A. Well, you know, I -- you know,
10 we are a bank have million of customers and
11 at that time, '99 was almost manual system
12 and we have hundreds of branches. Now -- and
13 at that time, again, I agree with you, if you
14 look at it now, you know, it's a big amount.
15 But you can see also see from the same
16 statement how things has changed over the
17 years, you know, just the few years after
18 this one.

19 So, you know, at that time I
20 can tell you that it's not unusual that much
21 that you see a lot of individuals will be --
22 you know, people used it to -- at that time
23 was to buy and sell some lands in cash just,
24 you know, people cash -- they give cash and
25 go to the -- change the title and deed and

1 they give the cash and they go put this in
2 his bank account. And I have seen, you know,
3 transactions where people have -- at the time
4 they just change buying houses use the cash.

5 So...

6 Q. Turning to the next page,
7 41456, the fifth entry down is a cash deposit
8 for a little over 443,000 riyals -- I'm
9 sorry, the one above that. The fourth. I'm
10 sorry.

11 The fourth one down is cash
12 deposit for a little over 443,000 riyals, and
13 you see in the note field it specifically
14 refers to Al-Haramain Islamic Foundation?

15 A. Yes.

16 Q. Okay. And if we turn to
17 page 41460?

18 A. Yes.

19 Q. You see there are a series of
20 deposits into Aqeel's accounts that include a
21 notation "Al-Haramain Islamic Foundation"?

22 A. Right.

23 Q. And so this indicates within
24 the own -- the bank's own records that Aqeel
25 was depositing Al-Haramain Islamic fund

1 foundations {sic} into his bank account,
2 right?

3 A. Is this the same account that
4 the bank received a letter to change it from
5 his name to Al-Haramain name or not?

6 Q. It is not. This account was
7 never changed during the '98 to 2002 time
8 period.

9 A. Well, again, I'm not familiar
10 with the details of this account, but here
11 where we -- it reads this money was deposited
12 for Al-Haramain Islamic Foundation, but,
13 again, I don't know the details of it.

14 Q. So do you agree, given the
15 amount of cash and the number of cash
16 transactions, along with the fact that a
17 number of them were specifically referenced
18 as Al-Haramain Islamic Foundation monies,
19 that it would have been relatively easy for
20 someone at the bank who is paying attention
21 to this account to realize that this was
22 using -- being used by Ageel for some other
23 purpose other than his own personal affairs?

24 MR. CURRAN: Objection as to
25 form.

1 You may answer.

2 THE WITNESS: So, Mr. Carter,
3 this -- this cash being brought to the
4 branch. Now, when someone -- he put,
5 you know, cash deposit into
6 Al-Haramain, I don't know how -- you
7 know, I don't know how -- how -- you
8 know, how he came to this. So it
9 could be -- I'm not suggesting it's
10 the case because why we would not see
11 it in other and now we see it.

12 It could be, you know, he's
13 working in Haramain, so this is the --
14 someone in the branch assumed for this
15 transaction Al-Haramain Islamic
16 Foundation. It could be he himself
17 when he visit, he went to the branch
18 to write this is to move to
19 Al-Haramain. So I have no idea
20 about -- about why it's there.

21 Now, again, you know, we have
22 millions of customers, millions of
23 accounts. This is '99. No system --
24 if the branch manager visit branch or
25 missed, you know -- you know, missed

1 this some big transaction or some
2 transaction came to Haramain, it's --
3 you know, at that time -- at that time
4 with the manual system at the bank,
5 you know, could be -- could be -- and
6 again, this is not only -- you know,
7 and now I just want to repeat,
8 especially, you know, easy to look at
9 it -- you know, look at it at what it
10 was at that time.

11 Banks globally, you know,
12 not -- you know, I think coming now
13 and look at the Al Rajhi, one customer
14 25 years and say, why did not this,
15 why no, why in '23 standards, and this
16 is '24. So you need to see also what
17 was -- you know, what was things and
18 other banks and also other countries.

19 And then in the -- you know, we
20 are in different world today. Banking
21 is totally different today. The
22 governance, compliance are different.
23 Cash monitoring today is much, much
24 different than what it used to be
25 before.

1 Systems today can help you a
2 lot. You don't rely on, you know --
3 especially like Al Rajhi Bank, the big
4 retail branches, you know, we have
5 today -- as I said, you know, we have
6 more than 20 million customers and
7 also we are one of the biggest in
8 terms of small and big businesses.

9 And so, you know, it's very
10 important, you know, to see this
11 within the time it was there. You
12 know, I agree with you, today look at
13 it, it looks, oh -- it looks
14 something. But -- and again, and I
15 would assume, if we look at other
16 accounts, we might also have --
17 differently, not other accounts, you
18 know, at that time, most of the
19 customers, most of the businesses,
20 most of the individuals, if you look
21 at their account, cash transaction,
22 cash deposit was much, much more than
23 before.

24 Actually, at that time, you
25 know, we were expanding and expanding

1 and then opening new branches and ATMs
2 because cash today we're starting to
3 closing some of our ATMs machine
4 because, you know, people are moving
5 more to the plastic cards and more
6 relying on getting away from the cash.

7 So it's good to see it in this
8 context.

9 QUESTIONS BY MR. CARTER:

10 Q. Am I correct that during this
11 time period, 1998, '99 and perhaps 2000, in
12 order to make a physical cash deposit, the
13 person would have to have gone to an Al Rajhi
14 Bank branch, correct?

15 A. The person will go -- yes and
16 no. Some customers, big customers, the bank
17 could offer them the same as where they take
18 the cash from them, as I recall. And I don't
19 have the details, but I know that if big
20 customers, sometimes the bank could go and
21 collect the cash.

22 Q. So someone at the bank had to
23 interface with the clients for purposes of
24 dealing with this -- these kinds of cash
25 transactions?

1 A. No, I think at that time, you
2 know, what -- what most of the business
3 that -- the customer come himself with the
4 cash, and then he would be in a line waiting
5 for his queue, and then he will deposit the
6 cash and get the deposit slip for the cash he
7 deposited.

8 Q. And so if we look at those
9 transactions that we discussed earlier from,
10 you know, May 5th of '99, to May 16th, there
11 were sort of two ways those -- that
12 approximate 6 million riyals in cash could
13 have been deposited at Al Rajhi Bank in those
14 11 days during the time period. Either Aqeel
15 or someone else brought the actual money to
16 the bank and handed it over to a bank
17 employee at the branch.

18 Right?

19 A. Yes.

20 Q. Okay. And there would be a
21 branch manager on a daily basis?

22 A. Yes.

23 Q. Okay. And the only alternative
24 is that someone from the bank would have gone
25 to get the cash from Aqeel and take it back

1 to the bank and deposit it?

2 MR. CURRAN: Objection as to
3 form.

4 You may answer.

5 THE WITNESS: Yeah, that's --
6 that's -- could be very few customers
7 based on their activity or the
8 bank could have -- again, I don't
9 remember whether this was during this
10 period or not, but it could happen for
11 some customers.

12 QUESTIONS BY MR. CARTER:

13 Q. We talked some about the
14 current monitoring protocols and the things
15 you can do with electronic systems, and I'm
16 just trying to be clear, that an employee of
17 the bank would necessarily have been aware of
18 all of these cash transactions coming in?

19 A. Yes.

20 MR. CURRAN: Objection as to
21 form.

22 You may answer.

23 THE WITNESS: Yeah, yeah,
24 you're right, but to -- he will see
25 the staff -- tons of customers doing

1 the same thing, they were bringing a
2 lot of cash. It's not only one
3 customer. I don't know which branch
4 is this one. Let me just try to read
5 the branch -- does this show us the
6 branch here on the statement?

7 So this is -- so some of the
8 branches I can't see the branch name.
9 Oh, Al Olaya. Yeah, this is a bigger
10 branch. This is, actually, not far
11 away from where we're having our
12 meeting here. It's -- especially at
13 that time in the '99, 2000, it was to
14 be -- still is, but it used to be even
15 more, very important commercial,
16 active area.

17 So this branch, you know, he
18 will see -- they will see big number
19 of customers who they will come with
20 the cash and they deposit because it
21 is a business area and they have, you
22 know, activities in that branch.

23 QUESTIONS BY MR. CARTER:

24 Q. Did you believe that that
25 branch encountered a lot of customers in the

1 1999 period who in an 11-day period deposited
2 cash in the equivalent of \$5 million into
3 their personal account?

4 MR. CURRAN: Objection as to
5 form.

6 THE WITNESS: Yeah, I don't
7 know, but I'm saying, you know, Al
8 Olaya branch, which is based in the
9 city, bigger branch at that time
10 beginning in 19 -- in 2000. So it is
11 a bigger branch, so that's what I
12 said.

13 QUESTIONS BY MR. CARTER:

14 Q. But are you aware whether any
15 of Aqeel Al-Aqil's cash deposits were ever
16 reported as suspicious?

17 A. I am not aware of any
18 transaction being reported or not. And any
19 transaction, when there's a suspicious
20 transaction, normally it goes without --
21 without I know about it. Just go by -- you
22 know, by the -- the -- the right department
23 who supports to look at this and send it
24 without -- comes to -- I didn't see it.

25 Q. And on the page we looked at

1 previously that indicated Al-Haramain Islamic
2 Foundation in the notes related to the
3 deposits 41460 --

4 A. This is we're talking July '99,
5 right?

6 Q. Yeah.

7 During that time period, when
8 you're working as general manager, do you
9 know from your work at that time how that
10 Al-Haramain Islamic Foundation notation would
11 come to be included in this data field?

12 A. Come to -- sorry, not get the
13 question.

14 Q. Do you know how the reference
15 to Al-Haramain Islamic Foundation would have
16 come to be included in this record of the
17 bank?

18 A. No, I wouldn't know.

19 Q. So you don't know whether or
20 not that would have required someone at the
21 branch level to include that notation?

22 A. Yes, I wouldn't know if someone
23 need -- I think most likely, you know, these
24 are -- most likely the teller staff who do
25 the transaction, he will -- he would will --

1 he will explain the transaction.

2 So, you know, and he would put
3 Al-Haramain, again, at this -- and the
4 customer would inform him that, you know, to
5 put this or he linked this transaction
6 something to do with Al-Haramain.

7 But it's normally done by the
8 teller staff in the branch. In this case
9 that's what they record.

10 MR. CARTER: Chris, we're going
11 to go shift to a somewhat different
12 topic for -- in a second here. So,
13 you know, if it's a convenient time
14 for a break, that's fine.

15 MR. CURRAN: Let me ask the
16 witness.

17 Do you want to take a break or
18 continue?

19 THE WITNESS: We can continue.

20 MR. CURRAN: We're okay to
21 continue.

22 MR. CARTER: Okay. Okay. I
23 could use a two-minute bathroom break,
24 so why don't we do that and we'll come
25 right back.

1 THE WITNESS: Okay.

2 MR. CURRAN: Okay.

3 THE WITNESS: Good idea.

4 VIDEOGRAPHER: Off the record.

5 7:40 p.m.

6 (Off the record at 7:40 p.m.)

7 VIDEOGRAPHER: On the record.

8 7:47 p.m.

9 QUESTIONS BY MR. CARTER:

10 Q. Mr. Al Rajhi, just to close up
11 our discussion of this topic about the Aqeel
12 Al-Aqil account.

13 I believe you testified earlier
14 in the day that that were protocols at place
15 in Al Rajhi Bank in this 1998, '99 time frame
16 for reporting suspicious transactions; is
17 that correct?

18 A. That's what I recall.

19 Q. Okay. And again, we've looked
20 at this series of transactions in which there
21 were ten deposits into Aqeel's account over
22 the course of 11 or 12 days in physical cash
23 totaling upwards of 6 million riyals,
24 correct?

25 A. Yes, that's what you showed me

1 before.

2 Q. And if that kind of activity
3 weren't sufficient to trigger a requirement
4 to report a suspicious activity, what would
5 it be during this time period?

6 MR. CURRAN: Objection. Lack
7 of foundation.

8 You may answer.

9 THE WITNESS: You know, I'm not
10 familiar, you know, with these
11 transaction, how it works, what the
12 size of -- of average transaction each
13 branch. So I would assume, again,
14 that the different branches, different
15 location has different limit of amount
16 shows suspicious transaction.

17 But I know today, this looks
18 these amount is very big money, but at
19 that time, you know, it would --
20 deposit in cash of this size, it's not
21 very much unusual.

22 And again, you know, Al Rajhi
23 Bank is a very, very big branch. It's
24 400 branches, a big number of staff.
25 Systems at that time, it's not as good

1 as it is today.

2 So -- and cash, it was not as
3 it is cash today. So it was not -- so
4 at that time maybe there was some
5 focus and maybe more than cash because
6 it was not that -- it's not like it is
7 today.

8 And actually, you know, if
9 you -- at '90s, many people when they
10 give a charity, they come and bring
11 cash, bank -- you know, they didn't --
12 they didn't -- you know, many people,
13 they didn't -- they didn't have
14 checkbooks. You know, at that time
15 who have checkbooks, very few people.
16 So people normally will take cash and
17 deposit.

18 And so this is -- this is
19 different. Today we're in different
20 world.

21 QUESTIONS BY MR. CARTER:

22 Q. I understand that, Mr. Al
23 Rajhi.

24 And if these were a series of
25 deposits of \$50 into Mr. Aqeel's personal

1 account over ten days, we maybe wouldn't be
2 talking about this. But we're talking about
3 millions of riyals being deposited in cash
4 over a period of ten days by someone who is
5 later designated as a terrorist sponsor by
6 the United States.

7 And, you know, in that context,
8 you know, do you believe that the bank
9 fulfilled its AML obligations in its handling
10 of this Aqeel account?

11 MR. CURRAN: Objection as to
12 form. Lack of foundation.

13 You may answer.

14 THE WITNESS: Yeah, at that
15 time he was not -- he was -- he was
16 not -- there was not an issue with him
17 as an individual. He was not
18 designated. He was -- and again, if
19 I'm -- if I'm not mistaken also, he
20 could be a businessman. He could have
21 his own businesses, which is, you
22 know -- so at that time he was, you
23 know, an average individual.

24 This is why maybe explain that
25 you have seen after -- that his

1 account, you know, we don't see these
2 kind of transactions. When the
3 suspicious started, most likely,
4 that's where you have seen -- we
5 didn't see these number of
6 transaction. Just between '99 and '22
7 or '21, big change in the way this
8 account has been operating.

9 QUESTIONS BY MR. CARTER:

10 Q. Well, in the time period that
11 we're talking about, the bank did have
12 information available to it that Ageel was
13 the director of Al-Haramain Foundation,
14 correct?

15 A. Sorry, what was the question?

16 Q. The bank did have information
17 available to it indicating that Ageel was the
18 director of Al-Haramain Foundation?

19 A. At this time, at '99?

20 Q. Yes.

21 A. Yes, at '99, yes, he -- but
22 this account was not -- yeah, but this
23 account was -- his personal account was not a
24 Haramain account.

25 Q. Correct.

1 And so what the bank knew about
2 him personally is that his job was the
3 director of Al-Haramain Islamic Foundation,
4 right?

5 MR. CURRAN: Objection as to
6 form. Lack of foundation.

7 You may answer.

8 THE WITNESS: Yes. Yes. He is
9 and the bank of course when it comes
10 to Al-Haramain, that his office is in
11 Al-Haramain.

12 QUESTIONS BY MR. CARTER:

13 Q. And part of the bank's due
14 diligence in assessing whether or not a
15 transaction being carried out by any
16 individual are suspicious is understanding
17 who that person is and what they do, correct?

18 MR. CURRAN: Objection as to
19 form.

20 You may answer.

21 THE WITNESS: Yeah, but at the
22 time the KYC is not like today at all.

23 You know, today if you open an
24 account with a KYC, you will know how
25 much income, how much -- you know, how

1 much business he has, what the -- and
2 this is all being put in the system.
3 At that time, no, it doesn't.

4 So if he's a businessman and he
5 opened an account and he -- every time
6 he deals with different individual in
7 the branches because he can't -- he or
8 his representative can take a queue
9 and then he ended in one teller, and
10 that teller take the deposits, and
11 KYC, it's basic. It hasn't -- the
12 system is basic and he deposit this
13 money in this time, I wouldn't be
14 surprised. Because asking a branch,
15 maybe -- maybe he did it with maybe
16 different, five, six, seven tellers.
17 Some of our branches at that time they
18 have seven, eight, nine, ten tellers.
19 And it's all manual. It's all manual.

20 So, again, I think we need --
21 we need -- when we look at this, we
22 need to see how things operate at that
23 time, what are the systems, you know,
24 what are the KYC being that -- you
25 know, it was -- and again, the KYC,

1 this is not only Al Rajhi. This is
2 everywhere. Globally, it was like
3 this. It was a basic.

4 QUESTIONS BY MR. CARTER:

5 Q. Well, if we look at the next
6 page of this, 41456, you'll be concentrating
7 on the roughly 6 million riyals that came
8 into the account over 11 days, it all
9 continues throughout the remainder of May of
10 1999, through May 27th, including --

11 A. So you're referring to what
12 period?

13 Q. I'm referring to the period of
14 May 17, 1999, to May 27, 1999.

15 So this is a continuation of
16 the same month we were looking at, and
17 there's another --

18 MR. CURRAN: Yeah, the witness
19 does not have the document in front of
20 him, as you can see, Mr. Carter.

21 MR. CARTER: Okay. It's 41456
22 is the page we're on.

23 MR. CURRAN: Are you asking for
24 the exhibit to be shown, Mr. Carter?

25 MR. CARTER: Yeah, sorry.

1 QUESTIONS BY MR. CARTER:

2 Q. Okay. So we've talked about
3 the period between May 5 to May 16, and now
4 this section is the period, the same year
5 1999, from May 17 to May 27.

6 And on the prior page -- or I'm
7 sorry, at the top, this period, the account,
8 you know, starts in 6 million riyal range and
9 ends up, as a result of deposits, in the 15
10 million riyal range.

11 So literally within the month
12 of May, your records reflect that the Aqeel
13 Al-Aqil account exploded from a negative
14 balance to 15 million riyals via about 10
15 million riyals in cash deposits and a 5
16 million riyal collection check.

17 And you believe that that kind
18 of activity would have been viewed as normal
19 during the time period we're talking about?

20 MR. CURRAN: Objection as to
21 form. Lack of foundation.

22 You may answer.

23 THE WITNESS: So, Carter, you
24 know, as I said, it's -- you know,
25 it's -- you know, at that time it's

1 not unusual for customer to deposit
2 this much of money between checks and
3 cash of 15 million riyal in ten days.
4 It's not every customers, but many,
5 many, many customers they have similar
6 to this behavior of accounts.

7 So and, again, we talking about
8 '99. So it's not like -- you know,
9 it's -- as I said, the society was a
10 cash society, and I think we did -- as
11 a financial society, we did a very
12 good job at Al Rajhi contributing a
13 lot to this because of our size and,
14 you know, our customer base. That
15 today we didn't see these kind of
16 transactions and these cash deposits.

17 But at that time, yes, you
18 know, businesses, real estate people,
19 people go and buy lands and real
20 estate and they exchange cash, and at
21 the end of the day, they deposit the
22 cash, millions they deposit, in the
23 branch.

24 QUESTIONS BY MR. CARTER:

25 Q. And isn't it the bank's

1 responsibility to understand where the money
2 came from even during this period?

3 A. It is their responsibility, and
4 the bank definitely reports certain things
5 when they see -- when they see, you know,
6 suspicious transactions.

7 But, again, you know, you're
8 asking me why these big number of cash is
9 being deposited in ten days, you know, the
10 bank did not do anything. I said this is not
11 unusual for a customer and that -- you know,
12 individual customers who deposit these
13 monies, especially when at that time no
14 system, it's all manual, and a bigger branch
15 like this, they come and they visit the
16 counter, and there's a number of tellers. At
17 this time he visit teller, another time he
18 visit another tellers, and there could be --
19 it could be not picked up.

20 And also at that time I think
21 the whole -- you know, everyone, you know,
22 cash transaction was not as scarce as it is
23 today. It was -- you know, it was just --
24 and again, a number, in Saudi Arabia, you
25 know, at that time there was not any tax --

1 you know, any tax, whatever, whatever, VAT or
2 income tax or even sale tax. Now -- of
3 course now we have -- you know, we have
4 taxes, we have -- at that time there was not.

5 So even for people for -- you
6 know, at that time that people -- you know,
7 it's not like about -- you know, we were
8 trying to avoid and collect unofficial
9 amounts.

10 So that's -- that was -- and
11 this is -- you know, this kind of customer
12 behaving like this, you would find it in
13 Al Rajhi bank and you'll find it in local
14 banks. And, again, globally and regionally,
15 you will see these kind of transactions at
16 that time. Of course today is different.

17 Q. And again, I'm just trying to
18 understand. You said there was a requirement
19 in place for bank personnel to report
20 suspicious transactions, and if this series
21 of transactions resulting in deposits of 15
22 million riyals in a personal account in less
23 than a month, 10 million of it being in cash,
24 didn't trigger any suspicious activity report
25 requirement, what would?

1 MR. CURRAN: Objection. Asked
2 and answered.

3 You may answer.

4 THE WITNESS: No, I think -- I
5 think I already answered this
6 question. You know, it's the same
7 thing. You know, it's -- you know, I
8 actually can't -- I mean, I tried to
9 explain it and tried to take you -- to
10 what it was -- things there, you know,
11 at that time. Where -- again, we're
12 talking about 24 years ago.

13 And today -- today -- today I
14 assure you, you know, something like
15 this wouldn't -- wouldn't let -- the
16 system would pick it up and will show
17 because, you know, you didn't see
18 these big cash deposits from an
19 individual like what it was 24,
20 25 years ago.

21 Okay. The systems are -- our
22 KYC data is much, much more details
23 today. You know, you have -- you have
24 a lot of information, which is before
25 it was just, you know -- you know,

1 maybe basic his name and his ID number
2 and that's it.

3 And again, because, you know,
4 this is not only with us here. This
5 is many other places. So this is --
6 you know, this kind of transaction you
7 will not see it today.

8 (Al Rajhi Exhibit ARB 50 marked
9 for identification.)

10 QUESTIONS BY MR. CARTER:

11 Q. Shifting gears, if we can mark
12 as the next exhibit the document at Tab 101.

13 Mr. Al Rajhi, this is a page
14 that we retrieved from the Sulaiman Al-Rajhi
15 Charitable Foundation web page.

16 Have you seen this before?

17 A. No, I haven't.

18 Q. Are you familiar with the
19 Sulaiman Al-Rajhi Charitable Foundation?

20 A. Yes, I'm familiar.

21 Q. This --

22 MR. CURRAN: I'm sorry,
23 Mr. Carter. Is this document also in
24 Arabic?

25 THE WITNESS: No.

1 MR. CARTER: No. Sorry. The
2 web page was in English.

3 MR. CURRAN: The web page is in
4 English -- but the witness can -- fair
5 enough.

6 QUESTIONS BY MR. CARTER:

7 Q. What is your understanding of
8 the Sulaiman Al-Rajhi Charitable Foundation?

9 A. You want just -- can I just go
10 through this to understand what is written
11 here?

12 Q. Sure, you can read it.

13 A. Yes.

14 Q. And this document indicates
15 that the Sulaiman Al-Rajhi Charitable
16 Foundation was founded but a joint committee
17 between the brothers Saleh, Abdullah and
18 Sulaiman and Mohammed Abdul Aziz Al Rajhi in
19 the year 1983.

20 Do you see that?

21 A. Yes, I see it.

22 Q. And are you familiar with the
23 founding of the charitable foundation through
24 a joint committee that's described in that
25 sentence?

1 A. Sorry, joint committee. So
2 what's the question?

3 Q. Are you familiar -- are you
4 familiar or aware of the fact that the
5 brothers Saleh, Abdullah, Sulaiman and
6 Mohammed Abdul Aziz Al Rajhi formed a
7 charitable foundation in 1983?

8 A. No, I think -- I think at that
9 time -- I'm not familiar. This goes back to
10 almost 40 years ago. So I'm not -- and a lot
11 of things has changed, you know, during this
12 40 years.

13 But I didn't think there was
14 any charity -- charity -- what you call, a
15 foundation by the name of foundation. This
16 was -- it's like, you know -- this is what it
17 say, the four brothers and in that time they
18 used together giving -- you know, having this
19 charity office to -- to help and at that time
20 in the beginning. And of course later my
21 father has -- has his own charity office. We
22 call it under his foundation being
23 established.

24 Q. So as I understand what you
25 just said, in this 1983 time period, the

1 brothers form some sort of charity office to
2 engage in philanthropic activities?

3 A. Yes, I would -- yeah, whether
4 it's office or they just work and then -- I
5 don't know anything. Was it an office or
6 they just worked together, you know, someone
7 do it in their behalf, I -- I don't know.
8 But, again, it's 40 years ago, I don't know
9 what was -- you know, how it works.

10 Q. Okay.

11 A. But I know there was not --
12 there was not foundation -- by a foundation.
13 It was -- you know, it was individual work
14 together they do it. At least this is what
15 is being written here.

16 Q. Okay. And during the -- you
17 mentioned as well that your father Sulaiman
18 Abdul Aziz Al Rajhi had a charity office
19 prior to the existence of the foundation,
20 correct?

21 A. Yes.

22 Q. And do you know when his
23 charity office was established?

24 A. No, I don't know which year
25 it's been established.

1 Q. Do you know whether his charity
2 office was operating in the 1998 to 2002 time
3 period?

4 A. 19 -- charity, you mean charity
5 office in 1988? Yes. Yeah, in --

6 Q. Okay. I asked about whether or
7 not the Sulaiman Abdul Aziz Al Rajhi
8 charity's office was operating in the 1998 to
9 2002 time period.

10 A. Yeah, 1998, yes, I would assume
11 is. Well, let me -- you know, my father and
12 also his brothers, you know, they -- they
13 were poor. You know, their childhood was
14 very, very difficult childhood. You know,
15 they went through -- which is they cannot
16 find enough to eat. They have to move from
17 where they stayed, you know, left their town,
18 you know, because they're poor.

19 So my -- and my father
20 intention was from the beginning, you know,
21 when he had some wealth, for him it was
22 always in his mind, you know, because he
23 survived. He suffered. You know, he lived
24 this child -- you know -- you know, the
25 difficult position for his childhood, so he

1 wanted to give back.

2 So I know starting from the
3 early days he starting, you know, giving --
4 so, you know, working and then making a
5 charity, it was during -- it was, as I said,
6 from what I read here in the beginning, it
7 was between the four brothers and then has
8 his own charity office, again, and after he
9 had his foundation.

10 Q. In the 1998 to 2000 period, was
11 your father carrying out his charitable work
12 through his own office?

13 A. That's -- that's what -- again,
14 I don't have the details, but that's what I
15 think.

16 Q. And do you know during that
17 time period was he also engaged in any
18 charity work via a joint office with his
19 brothers?

20 A. During this period '98 to 2002?

21 Q. Correct.

22 A. Again, I don't have a date, but
23 most likely not.

24 Q. So as best as you can recall
25 Sulaiman Abdul Aziz Al Rajhi, your father,

1 during this period was carrying out his
2 charitable activities via his charity office?

3 A. Yes, that's what I can recall.

4 Q. And that charity office was not
5 formally established as a foundation until
6 2000 according to this document, correct?

7 A. Yes. According to this
8 document, which you just showed me, yes.

9 Q. And during the 1998 to 2002
10 time period, did your father's charity office
11 have a license to engage in charitable work?

12 A. No, nothing -- you didn't
13 realize this. If you are an individual, you
14 want to give from your own money charity, and
15 you have someone or you have your office to
16 do that, you realize this when you are
17 collecting money from other people. But if
18 you're not -- if you are just paying from
19 your own money, no need for license.

20 Q. But during that time period,
21 there was no legal entity established as a
22 foundation in the 1998 to 2002 time period,
23 correct?

24 MR. CURRAN: Objection as to
25 form. Lack of foundation.

1 You may answer.

2 THE WITNESS: Yeah, I think
3 from what -- what you have shown now,
4 they had it in 2000, but '98, he did
5 not have official foundation.

6 QUESTIONS BY MR. CARTER:

7 Q. Okay. And so all of those
8 activities during that time, the charitable
9 activities, would have been carried out
10 through his charity office?

11 A. Yes.

12 MR. CURRAN: I'm sorry, during
13 what period?

14 MR. CARTER: I'm sorry, the '98
15 to 2000.

16 MR. CURRAN: Okay. Again, from
17 what I see now the document, this
18 would suggest the dates, but -- and
19 again, having that license 2000
20 with -- with -- all the activity
21 weren't there, I have no information.
22 I don't have enough details.

23 But, again, you know, as
24 individual, you want to give from your
25 own money as a charity, you know, you

1 can have your charity office or you
2 can do it yourself directly.

3 QUESTIONS BY MR. CARTER:

4 Q. And have you ever been involved
5 in the activities of your father's charity
6 office when it was in existence?

7 MR. CURRAN: Objection. Vague.
8 You may answer.

9 THE WITNESS: No, I was not in
10 this charity office.

11 QUESTIONS BY MR. CARTER:

12 Q. Did you ever have any informal
13 involvement in the activities of the charity
14 office?

15 A. Informal, what do you mean by
16 "informal"?

17 Q. Did you -- did you ever provide
18 any assistance to facilitate its activities?

19 A. No. This charity office, it's
20 a separate office located near to his home
21 and he has some people working for him, so I
22 was not involved.

23 Q. So physically the office was
24 located near to his home in --

25 A. Yes.

1 Q. -- in the '98 to 2000 time
2 period?

3 A. Yes.

4 Q. And was it located in a
5 facility associated with Al Rajhi Bank?

6 A. No, it was not. His office --

7 Q. And if I'm understanding you
8 correctly, he was operating the charity
9 office from '98 until the formal
10 establishment of the foundation in 2000 and
11 then operating as the foundation after that
12 point in time?

13 A. Well, this is what the document
14 you have shown me suggests.

15 Q. You don't have any independent
16 recollection of that?

17 A. No. You know, with these -- I
18 know this is -- this is -- it was a charity
19 office, and then he has his own charity
20 office, charity foundation. So I know this
21 was, but the date -- the exact dates, 2000,
22 2001, this is -- I don't recall the exact
23 dates.

24 Q. And did the charity office or
25 foundation during the 1998 to 2002 time

1 period ever serve as a vehicle for you to
2 conduct charitable activities?

3 A. No.

4 Q. You've never contributed any
5 money during that time period to the charity
6 office or the foundation?

7 A. No, I did not. It was always
8 my father's money.

9 Q. And, you know, during the 1998
10 to 2002 time period, did you have any
11 interactions with the personnel at the
12 charity office for the foundation?

13 A. Yes, I would -- I would --
14 yeah, I would have some -- I would have some
15 contact with them or -- I know them there.

16 Q. Okay. And was there any
17 particular reason you would have contact with
18 them, or is it just because they worked for
19 your father?

20 A. No, no, it could be sometimes
21 that things has to do with my father, you
22 know, charity things, in term of, you know,
23 something about -- you know, it's a -- of
24 course -- I think most likely it would be
25 like -- like things related to my father,

1 some of his charity work.

2 Q. Were you ever involved in
3 working with your father to identify entities
4 to receive support via his charity office or
5 foundation?

6 A. Sorry, can you ask again?

7 Q. Did you ever have any
8 involvement in helping your father identify
9 entities or causes --

10 A. No.

11 Q. -- to receive support?

12 A. No. I never.

13 Q. Did you ever assist your father
14 in conducting an evaluation of an entity or
15 cause he was thinking about supporting?

16 A. Well, yes, I could have some
17 discussion, you know, just -- just, I mean,
18 like, you know, spending more money for
19 education or something like this. Just
20 general, but -- but it was always arranged by
21 his, you know -- by his -- by the people
22 working for him in the charity office. And
23 if anything, it was, you know, just
24 unofficial.

25 You know, with my father, not

1 with the staff there, just, you know, it
2 could be general discussion that, you know,
3 for example, you know, because he -- he --
4 he -- he made his own -- part of his charity
5 he has his own university, which is teaching
6 medical. In his old town, the town he
7 suffered and he left because he could not
8 find -- he -- he started up a university in
9 association with the -- with the one -- one
10 very famous medical school in Holland.
11 And -- and today this university is
12 graduating a lot of -- a lot of doctor and
13 majority of them they don't -- they come as a
14 sponsor by -- by the charity. They don't pay
15 their fees because they can't afford it.

16 Q. In the -- in the period '99 --
17 1998 until the foundation was formally
18 established in 2000, do you recall the
19 employees -- who the employees were working
20 in the charity office?

21 MR. CURRAN: Objection.

22 Foundation.

23 You may answer.

24 THE WITNESS: Yeah, I think --

25 no, no, I don't know all of the

1 employees, but I know at least, you
2 know, the two names are familiar with
3 the -- their name to me, are the two
4 in charge of the office.

5 QUESTIONS BY MR. CARTER:

6 Q. And who are those two?

7 A. This is Abdul Rahman Al Rajhi,
8 and another one called Saleh Al-Habdan.

9 Q. Okay. And am I correct that
10 Abdul Rahman Al Rajhi's full name is Abdul
11 Rahman bin Abdullah Al Rajhi?

12 A. Yes, you are right.

13 Q. And he is the son of your
14 father's brother, correct?

15 A. No. He -- no, he -- he's
16 not -- he's -- he's not son of any of the
17 four brothers.

18 Q. Okay. Is he related to you?

19 A. Oh, yes. He is -- he is -- he
20 is married to my half -- half-sister.

21 Q. And do you recall when he began
22 working in the charity office?

23 A. Do I recall when?

24 Q. Yeah.

25 A. No. I know many, many years

1 before, but I don't recall when.

2 Q. And do you recall whether he
3 had a title within the charity office?

4 A. No, I don't know what will be
5 his title, but he -- he's I think -- he is
6 number one at the time. I didn't think now
7 for many years -- I think he left now for
8 many years. I'm not sure again. But I
9 think -- I think now he's not working there.
10 I think. I'm not sure.

11 Q. Do you recall -- do you recall
12 whether he continued to work for the
13 foundation after it was formed in 2000
14 through 2002?

15 A. No, I don't -- I don't recall
16 whether he -- I think -- I think most likely
17 by 2000 he was working.

18 Q. And you also mentioned I think
19 Saleh bin Sulaiman Al-Habdan?

20 A. Yes.

21 Q. Okay. And did he have any
22 familial relation to you?

23 A. What's -- what's the question?

24 Q. Was he in any way related to
25 you?

1 A. No. No, he is not.

2 Q. I've seen a reference to him in
3 a document as the imam of the Al Rajhi
4 mosque.

5 Do you know whether he had a
6 role serving as the imam at a family mosque?

7 A. Yes, he was, and maybe he's
8 still the imam of the mosque.

9 Q. And do you know him personally?

10 A. I know -- I met him a number of
11 times, yes.

12 Q. Do you know anything about his
13 background or religious training?

14 A. No, I don't know much about his
15 background other than he's working in the
16 charity. I think before he was -- he was a
17 teacher, something like this before he worked
18 for my father.

19 Q. And do you know anything about
20 the educational background of Abdul Rahman
21 bin Abdullah Al Rajhi?

22 A. No. I think he finished -- he
23 graduated, but I don't know what -- what
24 school or from where he graduated.

25 Q. And you don't know what area he

1 focused his studies on?

2 A. I'm not sure. I'm not sure.

3 No.

4 Q. Okay.

5 A. But, yeah, I think he was -- I
6 think -- I think he was a teacher, again,
7 before he worked for my father.

8 Q. And do you recall when Saleh
9 bin Sulaiman Al-Habdan first became the imam
10 at the Al Rajhi mosque?

11 A. Many, many years ago, but I
12 don't recall which year.

13 Q. Before the 1998 time period
14 we're talking about?

15 A. Yeah. Yes. He would be before
16 '98, '98.

17 Q. There are references in some of
18 the documents relating to the charity office
19 to an individual named Abdullah bin Ibrahim
20 Al-Misfer.

21 Do you know who that is?

22 A. No, I don't know.

23 Q. So you don't recall ever
24 communicating with Abdullah Al-Misfer in any
25 way?

1 A. I don't recall that I have
2 communicated with him.

3 Q. There -- did you know an
4 individual named Saleh Al-Hussayen?

5 A. Saleh, L?

6 Q. Al, S-a-l-e-h, Hussayen?

7 A. Like Hussain or Hussayen?

8 Q. Hussayen, I think.

9 A. Yeah, Saleh Hussayen, yes --
10 yeah, I am familiar with him. I know him.

11 Q. Okay. Who is he, as you
12 understand it?

13 A. Saleh Hussayen, he -- he's
14 government -- in the minister position. He
15 worked for Al Rajhi Bank when it's -- when it
16 started '98 in the Sharia committee of
17 Al Rajhi Bank at that time for some time.

18 MR. CURRAN: Excuse me. You
19 said -- you said when the bank started
20 in '98. Did you mean '88?

21 THE WITNESS: I mean '88.

22 MR. CURRAN: Okay.

23 THE WITNESS: Yeah, sorry, I
24 mean '88, 1988, when the bank started.

25

1 QUESTIONS BY MR. CARTER:

2 Q. So Saleh Al-Hussayen worked in
3 the Sharia committee at the bank when it
4 started in 1998?

5 A. Yes.

6 Q. And based on his role on the
7 Sharia committee, I understand that he was an
8 Islamic scholar of some sort?

9 A. Well, I don't know the
10 definition -- what do you mean by Islamic
11 scholars? I think everyone have it
12 different. But I know -- I know before that
13 he was a senior in the government and also
14 after -- after this, he was handling the two
15 holy mosques for the government. He was on
16 top of this organization taking care of the
17 two holy mosques in the government.

18 And he's -- he has the
19 reputation of a person who is humble and
20 modest.

21 Q. And do you know how your father
22 came to know him?

23 A. No, I don't know. But -- but
24 he's -- you know, he's a respected
25 individual, but I don't know how -- how he

1 first knew him.

2 Q. And do you know whether your
3 father had a -- a personal relationship with
4 Saleh Al-Hussayen?

5 MR. CURRAN: Objection. Vague.
6 You may answer.

7 THE WITNESS: What do you mean
8 by "personal relationship"?

9 QUESTIONS BY MR. CARTER:

10 Q. Did -- do you know whether they
11 were friends?

12 A. No. Personal, I mean, not --
13 not friends. I mean, other than he -- he
14 served on the Sharia, and he knows my father,
15 but -- but I cannot call them they are
16 friends.

17 Q. Do you know whether your father
18 ever consulted with him on religious issues?

19 A. I don't know.

20 Q. Do you know whether --

21 A. It was -- sorry. Sorry to say
22 this. When he was on the Sharia board of
23 Al Rajhi Bank, of course his job with other
24 board, Sharia board, is to -- you know, to
25 approve whatever product, whether it's to

1 comply with the Sharia principles or not.

2 Q. So his role on the Sharia board
3 was to help advise the bank as to whether
4 proposed products complied with Islamic law,
5 correct?

6 A. Yes, right.

7 Q. And, you know, besides the role
8 on the Sharia board, do you know whether he
9 had any involvement in serving as an advisor
10 to your father on religious issues?

11 A. I'm -- I'm not aware about it.

12 Q. Do you know whether he was ever
13 involved with either the charity office or
14 the foundation?

15 A. It could be. I remember my
16 father at the time he made committee for the
17 charity because, you know, when the people
18 who work there, it's like a committee, you
19 know, review these requests. So it could be
20 he worked on one of these committees for a
21 time.

22 Q. Okay. Do you recall when this
23 committee was formed?

24 A. No. No. I didn't -- I don't
25 recall when, but I -- but, you know, imam

1 there is some committee at the time my father
2 made, as I said, to -- to help him in
3 reviewing the requests coming from the people
4 who are working there before -- before it's
5 approved.

6 Q. And do you recall who any of
7 the other members of that committee were?

8 A. No.

9 MR. CURRAN: Objection.

10 Foundation.

11 You may answer.

12 THE WITNESS: I don't recall
13 others.

14 QUESTIONS BY MR. CARTER:

15 Q. Okay. Do you recall whether
16 that committee was operating during the 1998
17 to 2002 time period?

18 A. I don't know.

19 Q. Do you recall how many people
20 served on the committee?

21 A. No, I don't know.

22 Q. And do you recall anything
23 about backgrounds of any of the people who
24 were on the committee?

25 A. Yes, I didn't have the -- I

1 don't recall the details.

2 (Al Rajhi Exhibit ARB 51 marked
3 for identification.)

4 QUESTIONS BY MR. CARTER:

5 Q. Okay. If we can mark as the
6 next exhibit the documents at Tab 93.

7 Mr. Al Rajhi, this is a
8 printout that Al Rajhi Bank provided to us
9 for transfers from an account Al Rajhi Bank
10 held for the Saar Foundation to Al-Haramain
11 Islamic Foundation or principals such as
12 Ageel Al-Aqil.

13 Have you had occasion to see
14 this information before?

15 A. No. I'm sorry, I not
16 understand. What's this?

17 Q. I understand it to be an
18 extract from the bank's central banking
19 system itemizing transfers from an account
20 held in the name of the Saar Foundation to
21 Al-Haramain Islamic Foundation or at least in
22 one case Ageel Al-Aqil.

23 MR. CURRAN: Yeah. Mr. Carter,
24 I think you're mistaken. I don't know
25 the source of your understanding, but

1 our information is that this account
2 reflects Sulaiman Al Rajhi's
3 foundation, not Saar. I'm not
4 aware --

5 MR. CARTER: Okay. I'm sorry.

6 Let me -- let me clarify then.

7 QUESTIONS BY MR. CARTER:

8 Q. This is an account for the
9 Sulaiman Abdul Aziz Al Rajhi Foundation.

10 A. Yes.

11 Q. And it reflects transfers from
12 that account to Al-Haramain and Aqeel
13 Al-Aqil.

14 A. Well, yeah. This is a
15 statement here, I can see it.

16 MR. CURRAN: Yeah, you scroll,
17 but it's the same document.

18 THE WITNESS: Yeah, but here.

19 So I don't see the dates here. No
20 dates?

21 QUESTIONS BY MR. CARTER:

22 Q. I believe that the -- and I
23 apologize, I can only look at the English
24 version. And in my English version, the
25 dates are reflected in the fourth column from

1 the left. It says "ACC date."

2 A. Yeah. So this is '98. All
3 right. '98, '99, '99, 2000, 2000. Okay.
4 And here we're talking about?

5 Q. So during this period of
6 between '98 and 2000, were you aware that
7 your father's charitable foundation was
8 providing support to Al-Haramain Islamic
9 Foundation?

10 A. Well, this is what I see now,
11 but I'm not familiar with it.

12 Q. Okay. And did you have any
13 knowledge that during this time period, and
14 in particular in May of 2000, your father's
15 charitable foundation made a transfer to
16 Aqeel Al-Aqil?

17 A. No, I am not -- I'm not aware
18 about it.

19 Q. Do you know whether your father
20 knew Aqeel Al-Aqil?

21 A. I don't know if he knows him.

22 Q. And at least a few of these
23 contributions appear to occur in May of 1999,
24 the same time Aqeel was depositing large sums
25 of cash in his account, correct?

1 MR. CURRAN: Objection. Lack
2 of foundation.

3 You may answer.

4 THE WITNESS: I don't know --
5 understand. I don't know.

6 QUESTIONS BY MR. CARTER:

7 Q. Do you recall -- again, do you
8 recall at all during this period when you
9 were aware that your father was providing
10 support to Al-Haramain?

11 A. Well, I think this is what it
12 show, this statement, but I'm not familiar
13 with it, again, and know whether the charity,
14 how much money they give to -- to different
15 charity. I'm not -- I have no information
16 about it.

17 Q. Okay.

18 A. It's -- yeah, to '98 and '99,
19 2000, before -- before Al-Haramain started to
20 having a problem from what I read here.

21 (Al Rajhi Exhibit ARB 52 marked
22 for identification.)

23 QUESTIONS BY MR. CARTER:

24 Q. Okay. On that -- on that
25 issue, can we mark as the next exhibit the

1 document at Tab 94?

2 Mr. Al Rajhi, this is, again,
3 an extract that Al Rajhi Bank has produced to
4 us in response to a request for details of
5 contributions from your father's charitable
6 foundation to Al-Haramain.

7 And it reflects contributions
8 between 2000 and as late as August 27, 2002.

9 Do you see that?

10 A. Yes.

11 Q. And I think we discussed
12 earlier that the United States government had
13 taken action against Al-Haramain and
14 sanctioned two of its offices in March
15 of 2002.

16 Do you recall that?

17 A. Yes.

18 MR. CURRAN: Objection. Lack
19 of foundation.

20 You may answer.

21 THE WITNESS: Right.

22 QUESTIONS BY MR. CARTER:

23 Q. You told me, if I recall
24 correctly, that you -- the bank was
25 monitoring information during that time

1 period and received contemporaneous
2 information about the actions taken as to
3 Al-Haramain.

4 Is that -- is that correct?

5 MR. CURRAN: Objection. Lack
6 of foundation.

7 You may answer.

8 THE WITNESS: Yeah, when it was
9 in the news, 2004 -- 2003.

10 QUESTIONS BY MR. CARTER:

11 Q. Okay. Just --

12 A. But, Mr. Carter, this is -- of
13 course this is not from the bank. These
14 payments are from the charity -- from what I
15 understand from you, this is coming from a
16 charity office of -- not from the bank.

17 Q. Okay. It's coming from the
18 charity office of your father via an account
19 at the bank.

20 Do you agree with that?

21 A. I don't know if it was account,
22 but, yes, an account -- having an account was
23 opened and had been -- never been closed --
24 being closed with its -- when the government
25 closed their office, but it was open during

1 2001 and '2.

2 Q. Okay. As I'm just --

3 A. This account -- you know, the
4 bank would receive money from -- you know,
5 from different -- from different people, not
6 only from the charity office.

7 Q. Again, I just want to make sure
8 we're clear about what this document is.

9 This is a document reflecting
10 transfers from your father's charitable
11 foundation account at Al Rajhi Bank for the
12 benefit of Al-Haramain.

13 Do we agree about that?

14 A. Yeah, this is what -- what I
15 understand from you based on -- because I see
16 it only in English in front of me. This is
17 what it is suggesting, yes.

18 Q. And the document we have in
19 front of us --

20 A. And another statement, do we
21 have it in the statement?

22 MR. CURRAN: Yeah, this is an
23 English-only document, Mr. Carter?

24 THE WITNESS: And I don't see
25 the statement, the bank statement

1 itself. Right?

2 MR. CARTER: No, there's a --
3 oh, wait. Yeah, this is how this
4 document was produced to us, Chris.

5 THE WITNESS: Okay.

6 MR. CURRAN: Based on the --
7 how do you know it's the charity
8 office account?

9 MR. CARTER: Because it was
10 produced in response to those
11 requests.

12 Yeah, and, I mean, there's also
13 an account number that's designated
14 that corresponds to some statement
15 records and then these transactions
16 are reflected in statement records as
17 well.

18 But the statements, as you
19 recall, are many pages and this is a
20 concise extract, so it seemed helpful.

21 MR. CURRAN: Okay. So there is
22 a statement in Arabic, but it's not
23 being presented here.

24 THE WITNESS: Yes. Okay.

25

1 QUESTIONS BY MR. CARTER:

2 Q. Okay. And at least based on
3 the English document we have here, it appears
4 that there were transfers from the -- your
5 father's charity foundation account at the
6 bank for the benefit of Al-Haramain in
7 between June of 2002 and August of 2002,
8 correct?

9 A. Yes, that's what this document
10 say.

11 (Al Rajhi Exhibit ARB 53 marked
12 for identification.)

13 QUESTIONS BY MR. CARTER:

14 Q. And just going back, if we can
15 mark as exhibit -- the next exhibit, the
16 document at Tab 30.

17 I understand this to have been
18 a notification from SAMA in March of 2002
19 distributed to several banks, including Al
20 Rajhi, reporting on the freezing of accounts
21 associated with three entities, and two of
22 them are offices of Al-Haramain.

23 Do you see that on the second
24 page?

25 MR. CURRAN: Objection as to

1 form. Lack of foundation.

2 THE WITNESS: So the closure
3 of --

4 MR. CURRAN: We have the Arabic
5 as well, if you need it.

6 THE WITNESS: So this is -- so
7 this letter came from where?

8 MR. CURRAN: Can you show the
9 first page, Mr. Carter? Or I guess we
10 can scroll to it here.

11 THE WITNESS: Yeah.

12 MR. CARTER: If you -- if you
13 page to the third page.

14 THE WITNESS: Third page.

15 MR. CARTER: I think it was
16 produced possibly out of order. It's
17 a communication from the bank
18 self-supervisory committee chairman to
19 several people, including Saleh M.
20 Jarbu at Al Rajhi Bank.

21 THE WITNESS: Yes.

22 You have stated -- of subject.
23 Three names received from SAMA, we
24 have instruction from SAMA that in
25 addition to account freeze, any

1 financial transactions to and from,
2 name should be immediately blocked on
3 the report to SAMA.

4 This is -- which date was it?
5 7 March 2002. Okay. We see the
6 names.

7 QUESTIONS BY MR. CARTER:

8 Q. Yeah. The names on the next
9 page.

10 A. Yeah. This is the branch in
11 Albania. Okay. This is the branches of
12 Al-Haramain, yes.

13 Q. And so we -- there was some
14 confusion earlier about whether or not
15 Al Rajhi Bank had received notification of
16 the actions taken against the two branches of
17 Al-Haramain in 2002, and based on this
18 document, you agree that the bank did receive
19 that information at the time it happened?

20 A. Whether this suggests that,
21 yes, it came about -- this is not about
22 Al-Haramain Saudi. This is about overseas
23 branches of Al-Haramain.

24 Q. Correct.

25 And you received information

1 about the action taken against those branches
2 when it happened in 2002, right?

3 A. Right. But, again, this is not
4 Al-Haramain Saudi.

5 Q. And during this 2002 time
6 period, was your father still working with
7 the bank?

8 A. Which year?

9 Q. 2002.

10 A. Yes, he's still working. He
11 still was the chairman.

12 (Al Rajhi Exhibit ARB 54 marked
13 for identification.)

14 QUESTIONS BY MR. CARTER:

15 Q. If we can go back, there's a
16 second statement relating to an account in
17 the name of Aqeel Al-Aqil. It's at Tab 12.
18 If we can mark that.

19 Mr. Al Rajhi, this is an
20 additional account statement for Aqeel
21 Al-Aqil from Al Rajhi Bank, and I would just
22 like to direct your attention to page 41471.

23 A. 41471? Yes.

24 Q. And a little more than halfway
25 down the page, it indicates there was 220,000

1 riyal withdrawal from Ageel's account by
2 Abdul Rahman Abdul Aziz al Rajhi on
3 February 24, 1999.

4 Do you see that?

5 A. Yes, I see it.

6 Q. Do you have any understanding
7 as to whether or not Abdul Rahman Abdul Aziz
8 Al Rajhi had some sort of relationship with
9 Ageel Al-Aqil?

10 A. I don't know who is Abdul
11 Rahman Abdul Aziz Al Rajhi.

12 Q. Okay. Do you think this is
13 likely a reference to Abdulrahman --
14 Abdulrahman bin Abdullah Al Rajhi?

15 A. No. This is different name.
16 This is Abdul Rahman Abdul Aziz Al Rajhi,
17 different from Abdul Rahman Abdullah, so I
18 don't know if he's the same person.

19 Q. Is it possible it's the same
20 person and it's just entered wrong?

21 MR. CURRAN: Objection as to
22 form.

23 You may answer.

24 THE WITNESS: Yeah, I don't
25 know because I have my uncle, Hamad

1 Abdulaziz Al Rajhi in Jeddah, he's a
2 big businessman. You know, he's a
3 businessman, so this is what, a debit
4 or credit? A withdrawal by checks.
5 So he --

6 QUESTIONS BY MR. CARTER:

7 Q. A withdrawal.

8 A. So this one he debited from
9 Ageel and credit to Rahman Al Rajhi, right?
10 That what it suggest?

11 Q. Yeah.

12 A. So I don't know if this is the
13 same Abdul Rahman Abdullah al Rajhi but also
14 could be different individual which is in
15 Jeddah-based Rahman, which is my half --
16 half-uncle, and he's a businessman in Jeddah.
17 If this is commercial transaction between two
18 of them or anything else, I don't know.

19 But, again, I don't know
20 whose -- I don't know which one we're talking
21 about Rahman Abdul Aziz.

22 Q. And so the other individual
23 with the similar name is your father's
24 half-brother?

25 MR. CURRAN: Objection to form.

1 You may answer.

2 THE WITNESS: The other one
3 which is -- which is this Abdul Rahman
4 Abdul Aziz al Rajhi you mean or --

5 QUESTIONS BY MR. CARTER:

6 Q. Yes.

7 A. Yeah, Abdul Rahman Abdul Aziz
8 al Rajhi, if this is the man, he's a
9 half-brother for my father.

10 Q. Okay.

11 A. But he has nothing to do with
12 my father's business. You know, he's totally
13 separate, and he's based in Jeddah.

14 But again, you know -- you
15 know, our family is thousands of people, so
16 there's a lot of people that can -- may be
17 the same name with the three letter, so I
18 will not confirm that he is the same person.

19 Q. Over the course of the
20 statement, there's a quite a number of
21 withdrawals, many of which are just described
22 Abdul Rahman Al Rajhi. And again, you don't
23 know whether or not the Abdul Rahman Abdullah
24 al Rajhi worked in the charity office had any
25 association with Aqeel Al-Aqil.

1 Do you?

2 A. No, I don't know.

3 (Al Rajhi Exhibit ARB 55 marked
4 for identification.)

5 QUESTIONS BY MR. CARTER:

6 Q. Just we can mark as the next
7 exhibit the series of documents at Tab 92.

8 Mr. Al Rajhi, this is just a
9 handful of checks related to the transfers --
10 relating to transfers to Al-Haramain. And
11 then on the last page, there is a letter
12 dated April 6, 1999, from Abdul Rahman bin
13 Abdullah Al Rajhi.

14 MR. CURRAN: I think you just
15 have the translator statement on the
16 screen, Mr. Carter.

17 MR. CARTER: Sorry, the prior
18 page. I didn't mean the translator.
19 Before the Arabic. That's the one.

20 THE WITNESS: This is in
21 Arabic?

22 MR. CURRAN: Yeah.

23 THE WITNESS: '99. Okay.

24 QUESTIONS BY MR. CARTER:

25 Q. Okay. And this is a letter

1 from Abdul Rahman bin Abdullah al Rajhi in
2 1999 and the letterhead identifies him and
3 Saleh bin Sulaiman Al-Habdan.

4 I believe you told me that
5 those two people were in charge of your dad's
6 charity office between the 1999 period?

7 A. Yes.

8 MR. CURRAN: Objection as to
9 foundation.

10 You may answer.

11 THE WITNESS: Yes.

12 QUESTIONS BY MR. CARTER:

13 Q. And this is a letter to Sheikh
14 Aqeel bin Abdul Aziz Al-Aqil enclosing a
15 contribution for Al-Haramain Islamic
16 Foundation.

17 Do you see that?

18 A. Yes, I see it.

19 Q. And it references a
20 communication between Aqeel and Abdul Rahman
21 al Rajhi including a telephone call.

22 Do you have any information
23 concerning the nature of any dealings between
24 your father's charity office and Aqeel
25 Al-Aqil during this time period?

1 A. No, I am not familiar.

2 Q. You don't have any personal
3 knowledge of the contribution and issues that
4 are discussed in this letter, correct?

5 A. No, I don't have any knowledge,
6 any personal knowledge, about it.

7 Q. Do you have any reason to doubt
8 that Abdul Rahman bin Abdullah al Rajhi was
9 in contact with Aqeel Al-Aqil during this
10 time period?

11 MR. CURRAN: Objection as to
12 form.

13 You may answer.

14 THE WITNESS: Yeah, from this
15 letter, I think he -- he's -- he's
16 giving him this money to
17 support Kosovo, you know, as he said
18 here. So this is for supporting for
19 Muslims of Kosovo. That's what the
20 letter is suggesting.

21 QUESTIONS BY MR. CARTER:

22 Q. Yeah. No, I'm just asking
23 whether you have any reason to doubt that the
24 Abdul Rahman bin Abdullah al Rajhi was in
25 contact with Aqeel Al-Aqil during this time

1 period in relation to the work of your
2 father's charity office?

3 A. Well, I don't know exactly what
4 the -- I don't understand exactly the
5 question, but if you asked me is there any --
6 any contact between Aqeel Al-Aqil and Abdul
7 Rahman Al Rajhi, is this the question?

8 Q. Sure.

9 A. Yeah, of course, from this
10 letter there is a contact. There's a
11 telephone call. They send him a letter. So
12 this is -- if this is a correct letter, then
13 there's a contact between the two.

14 (Al Rajhi Exhibit ARB 56 marked
15 for identification.)

16 QUESTIONS BY MR. CARTER:

17 Q. And if we can mark as the next
18 document the document at tab 73.

19 This is a document we received,
20 Mr. Al Rajhi, from an individual named [REDACTED]
21 [REDACTED].

22 Do you know [REDACTED]

23 A. Yes, I know him.

24 Q. How do you know him?

25 A. I know him when -- you know,

1 when Saar being started, some foundation
2 being started. So he was official in Saar
3 Foundation.

4 Q. When you say "Saar Foundation,"
5 are you referring to a Saudi-based entity or
6 a US-based entity?

7 A. No, a US-based entity.

8 Q. And did you have any
9 involvement with the establishment of the
10 US-based Saar Foundation?

11 MR. CURRAN: Objection. Vague.
12 You may answer.

13 THE WITNESS: No, my
14 involvement -- you know, Saar
15 Foundation started maybe early '80s.
16 And the start -- and early
17 '80s, I can't recall, because it was a
18 long time ago. And so when it
19 started, they had some -- I attended
20 some, few meetings in the beginning,
21 that was, you know, again, in the
22 early '80s, maybe. But so that was --
23 1990s, early '90s, maybe. That was
24 the time that I was -- that I was,
25 again -- that was my father, but I was

1 there as -- in a few meetings with my
2 father at that time when he -- when he
3 just started Saar Foundation.

4 QUESTIONS BY MR. CARTER:

5 Q. So do I understand that your
6 father started the US Saar Foundation at some
7 point in the '80s?

8 A. I would assume, yes, maybe, the
9 '80s. Maybe. Yeah. Mid-'80s or before.
10 Yeah, about mid-'80s.

11 Q. Do you know if your -- do you
12 know what the Saar Foundation was established
13 to do?

14 A. You know, again, this is the
15 same story I gave you from before, that my
16 father, from the beginning, you know, because
17 of his childhood and the suffer he had, you
18 know, he was always -- you know, in his mind
19 he wanted to have -- to make a foundation and
20 to give some money to the people who -- who
21 they are in need, you know.

22 And -- and at that time he has
23 some advice from -- you know, from -- you
24 know, I think some -- you know, some maybe
25 advisors that US is well-established in term

1 of making a foundation, the law, and, you
2 know, it's advanced to other countries in
3 terms of charity and foundation.

4 So he was being convinced that
5 to start the foundation in USA. Especially
6 at that time in Saudi, you know, there was
7 not that practical way of making a foundation
8 that can operate in a practical way.

9 So that's -- that's -- that's
10 what I remember, you know, when my father
11 started.

12 Q. So the Saar Foundation was
13 established by your father to carry out
14 charitable endeavors?

15 A. Started by my father, is this
16 the question?

17 Q. Yeah. Started -- your father
18 created the Saar Foundation in the US to
19 carry out charitable activities?

20 A. Yes. Yeah, to make an
21 investment and use the proceed of the
22 investment to do charity work.

23 Q. And do you recall what your
24 father's investment was to create proceeds
25 from the charity work?

1 A. No, I'm not involved with it,
2 but I think it was different things, real
3 estate. I think at the time there was a
4 poetry {phonetic} project, and I think the
5 majority was real estate, if I'm not
6 mistaken.

7 Q. And was your father the sole
8 contributable -- contributor of the property
9 that was given to generate revenue?

10 A. Well, I cannot confirm the
11 sole, but he was the major, major
12 contributor, but I can't confirm if he was
13 the sole or not.

14 Q. And this document that we
15 obtained from [REDACTED] indicates that the
16 donors, the Saar donors, became very
17 concerned being linked to terrorist
18 activities, of course to which they had
19 nothing to do, and a question was asked, why
20 do we want to continue to be in the USA.

21 Do you recall any discussion of
22 that nature surrounding Saar in the 1997,
23 1998 time frame?

24 MR. CURRAN: Objection to the
25 foundation of this document.

1 You may answer.

2 THE WITNESS: So we are talking
3 about '97 and '98. Again, you know --
4 you know, I don't recall all the --
5 all the details, but what I know, my
6 father, as I said, I think in the
7 '80s, mid-'80s, decided to have that
8 foundation and -- and then after some
9 time, he get, you know, a little bit
10 disappointed about the performance of
11 Saar. And he thought, you know, Saar
12 maybe did not have the right principal
13 investment strategy and did not
14 perform well.

15 And then eventually I think
16 he -- he lost confidence in the people
17 who were managing and operating Saar.

18 QUESTIONS BY MR. CARTER:

19 Q. Well, this document refers to a
20 concern about being linked to terrorist
21 activities.

22 Do you recall any discussions
23 with your father or anyone else during this
24 general time period, 1997, 1998, that
25 included concerns about Saar being linked to

1 terrorist activities?

2 A. Yes.

3 MR. CURRAN: Objection as to
4 form.

5 You may answer.

6 THE WITNESS: Yes. Yes, I do.

7 I think -- I think this is --
8 this is -- was the case, what I
9 just -- and also there was some
10 negative news about Saar Foundation at
11 that time. I think also this
12 influenced my father's decision to
13 decide not to continue the Saar
14 Foundation in USA.

15 So -- so, yes, the news -- they
16 make the news about Saar there in US.
17 I would expect that had influenced my
18 father's decision.

19 QUESTIONS BY MR. CARTER:

20 Q. And what was the negative news,
21 as best you can recall?

22 A. Oh, I don't have, you know, the
23 details, but I think -- I think things about
24 some news that -- about the money being
25 disbursed maybe went to wrong entities, which

1 is -- could be suspicious of terrorists or
2 something like this.

3 Q. So as best you can recall, it
4 concerned some news suggesting the
5 possibility that the foundation had been used
6 to channel resources to terrorists, correct?

7 MR. CURRAN: Objection. Lack
8 of foundation.

9 You may answer.

10 THE WITNESS: You know, I
11 will -- I prefer to say it in my words
12 because I'm not sure about -- but I
13 think, you know, my father, or there
14 was -- there was news, negative news,
15 about Saar Foundation. And this news
16 of -- again, I don't -- I don't know
17 the details because this is -- we're
18 talking about almost 25, 26 years, but
19 it is about, you know, maybe some
20 money being -- being -- being provided
21 by Saar Foundation to an entity which
22 is -- which is -- could be linked to
23 wrongdoing or terrorism or something
24 like this.

25

1 QUESTIONS BY MR. CARTER:

2 Q. The note goes on to indicate
3 that the trustees decided to relocate the
4 operations and steps were taken to create
5 Humana Charitable Trust in 1997 as an Isle of
6 Man trust.

7 Do you know whether or not
8 that's accurate?

9 A. Yes, I think -- well, as I
10 said, you know, my father had a concern at
11 that time. It seems also at the same time
12 Saar, people specifically -- I think he
13 wanted to -- he wanted to -- I think he
14 wanted to continue involved with Saar
15 activities, so he came with the suggestion
16 that, you know, having the foundation and
17 this new section.

18 But what I know my father's
19 final decision was -- was, no, he wanted --
20 you know, he wanted -- he didn't want to
21 expose his reputation and his charity, you
22 know, for any potential -- and then he
23 decide -- and then he decided to focus on the
24 charity here, especially when the
25 practicality of managing charities in Saudi

1 was much better than it was. You know, there
2 was changing in how -- where the charity now
3 can own its investment, can buy and sell
4 without going to the court.

5 And so the decision -- the
6 final decision of my father did not accept
7 the suggestion of going to Isle of Man and
8 instead it gets back to Saudi.

9 Q. You mentioned that at some
10 point your father lost confidence in the
11 people who were involved with the Saar USA
12 entity.

13 Do you recall who the people
14 you're referring to were?

15 A. The question, where they are?

16 Q. No, who they were.

17 A. Yeah, I think I will call it
18 Saar people, which is, you know -- [REDACTED] was
19 the most active person and maybe the other
20 officers of Saar. I don't know at that time
21 who was the officers, the other officers.

22 Q. Was there -- was there an
23 individual named Sulaiman Al-Ali involved
24 with the Saar USA activities?

25 A. Sulaiman --

1 Q. Sulaiman Al-Ali?

2 A. Sulaiman Al-Ali?

3 MR. CURRAN: Can you spell that
4 last name, Mr. Carter?

5 MR. CARTER: A-l-i.

6 THE WITNESS: A-l-i. A-l-a --

7 Ali. Sulaiman Al-Ali?

8 QUESTIONS BY MR. CARTER:

9 Q. Yeah, I think.

10 A. Yeah. No, I'm not familiar
11 with this name as he's part of Saar.

12 Q. Are you familiar with him from
13 some other context?

14 A. No. I don't know, actually,
15 which individual we're talking about. I
16 don't recall which it was.

17 Q. Do you recall whether or not
18 Humana Charitable Trust was, in fact,
19 established?

20 A. Sorry, what's the question
21 again?

22 Q. Was action, in fact, taken as
23 referenced here to establish Humana
24 Charitable Trust?

25 A. On what basis what action has

1 been taken?

2 Q. Well, here it says steps were
3 taken to create the Humana Charitable Trust
4 in 1997.

5 Do you know if that happened?

6 A. Can you show me which -- which
7 paragraph you're referencing to?

8 MR. CURRAN: It's the
9 highlighted part.

10 THE WITNESS: Okay.

11 Yeah, so what's the question?

12 QUESTIONS BY MR. CARTER:

13 Q. Do you know whether steps were,
14 in fact, taken to create Humana Charitable
15 Trust in 1997?

16 A. You mean without -- 1990 --
17 what else has been created -- in discussion
18 with the Humana being created?

19 Q. Yeah.

20 A. I don't know if this is the
21 date, but I know Humana being -- being
22 created instead of Isle of Man. I don't know
23 which dates.

24 Q. Okay. And after Humana was
25 created, did Saar Foundation then make a

1 contribution of its assets to Humana?

2 A. Yes, I don't know if it is all
3 of its assets. Well, again, you know, it
4 was -- I think -- again, I don't have the
5 details. You know, but -- but the idea was
6 from Saar team that, you know, Humana will be
7 a charity instead of Isle of man. And then
8 eventually, I think after this -- after '97,
9 my father made the decision that -- that, you
10 know -- you know, as I said before, he wanted
11 to -- he was -- he was worried about, as I
12 said, the potential risk, you know, other
13 liability, whatever, so he wanted to be under
14 his foundation here in Saudi.

15 Q. Okay. This document goes on to
16 refer to, and some of this is crossed out, a
17 visit to the USA in July of 1998, and it
18 refers to Sheikh Sulaiman.

19 Do you recall whether your
20 father visited the United States in July 1998
21 to deal with some of these Saar issues?

22 A. No, I don't recall it.

23 Q. And the document goes on to
24 describe that instead of Humana doing all of
25 the legwork for the charity undertakings, it

1 could instead work with an existing committee
2 in Sulaiman's charity office.

3 A. Can you show me where you are
4 reading?

5 Q. Well, there's -- there's --

6 A. Yeah, here. Yeah. So the last
7 part --

8 Q. Yeah. A suggestion was made
9 then to optimize the grant-making process, we
10 should consider working with the charity
11 office already in existence.

12 And it goes on to say the
13 charity office is managed by Abdul Rahman bin
14 Abdullah al Rajhi, Saleh bin Sulaiman
15 Al-Habdan and Abdullah Al-Misfer.

16 Do you see that?

17 A. Yes.

18 MR. CURRAN: I'm going to point
19 to the witness' screen here,
20 Mr. Carter. So the first part he was
21 reading was up here.

22 MR. CARTER: Okay.

23 MR. CURRAN: And then the
24 second part --

25 THE WITNESS: In July suggested

1 that the trustee to optimize the
2 grant-making process we should
3 consider working with...

4 MR. CURRAN: While the witness
5 is reading that, just say again my
6 objection to the foundation of this
7 document, which I don't consider to be
8 a document. It might be an exhibit,
9 but there's indications that it's not
10 complete.

11 THE WITNESS: Okay.

12 QUESTIONS BY MR. CARTER:

13 Q. Do you recall whether there was
14 a suggestion in this 1998 time frame that the
15 Humana entity that had been established would
16 work with Sulaiman's charity office in Saudi
17 Arabia to streamline the grant requests?

18 A. No, I don't recall this. You
19 know, what I know that -- that, you know, the
20 same one is that -- yeah, go to Humana to
21 work and my father wanted -- it seems, you
22 know, from here -- and this is my father. He
23 wanted the -- the charity to be paid
24 quarterly under his charity in the KSA
25 because -- you know, because he has -- you

1 know, he -- you know, minimize any
2 potential -- or he's worried about the
3 reputation, risk or also at that time maybe
4 the confidence in Saar people in USA is not
5 like when it started.

6 So, you know -- so I think that
7 was also influencing his decision, that he
8 doesn't have -- but -- but, again, I didn't
9 recall the details of this, but what I know
10 that -- that Humana, you know, eventually did
11 not continue and you -- the charity moved
12 to -- to the foundation in KSA.

13 Q. And again, do you recall
14 whether your father visited the United States
15 in July of 1998?

16 A. No, I don't recall it.

17 Q. Do you recall whether you
18 visited the United States in that time frame
19 of 1998?

20 A. 1988?

21 Q. '98.

22 A. '98.

23 MR. CURRAN: '98, which is the
24 date referenced in the second
25 paragraph.

1 THE WITNESS: Yeah. 1998,
2 definitely I was not there if my
3 father was there. And I know -- I
4 never met my father -- I never -- I've
5 never been with my father on the same
6 trip to the United States. So --
7 so -- but I -- I -- '98, I could have
8 come, you know, in United States, but
9 different dates by that time.

10 QUESTIONS BY MR. CARTER:

11 Q. Okay. The charity office in
12 Saudi Arabia during that 1998 to 2000 time
13 frame was managed by Abdul Rahman bin
14 Abdullah Al Rajhi and Saleh bin Sulaiman
15 Al-Habdan?

16 A. That's what I recall.

17 Q. So this -- that statement in
18 the document is correct, as you recall?

19 A. Well, I -- yeah, as I recall,
20 Abdul Rahman bin Al Rajhi and Saleh
21 Al-Habdan, they were managing the charity
22 office.

23 Q. And then at the end of this, it
24 talks about checks being processed without
25 showing the contributor's name. These are

1 processed by Al Rajhi Banking & Investment
2 Corporation having its account with Chase
3 Manhattan and other correspondent banks.

4 Do you have any understanding
5 what that statement refers to?

6 A. The checks are processed
7 without showing their continued -- it still
8 is correct normally when you show the checks,
9 you know -- I mean, I'm not sure, but I
10 believe the checks, when it's being issued,
11 it's not unusual the beneficiary name but not
12 the remitter name or the person who -- that's
13 my understanding, but I'm not sure about it.

14 Q. Do you recall during this time
15 period your father implementing any procedure
16 that would allow contributions to issue
17 without identifying him as the donor?

18 A. No, again, I --

19 MR. CURRAN: Objection.

20 THE WITNESS: No, I don't know
21 how things are done in the check
22 office, but at the same time, you
23 know -- you know, it's -- when you
24 do -- when you help -- there's -- when
25 you help without showing your name,

1 you are getting better rewards that
2 you are -- than you are showing your
3 name. So that's -- that could be
4 also -- I know that some people, you
5 know, many people, you know, you see
6 here, they want to help, and they
7 don't to show their names as they're
8 giving the help.

9 And so this is not unusual for
10 someone, but I'm not sure about --
11 about the charity office, they make
12 sure that they show -- or they did
13 show their name.

14 QUESTIONS BY MR. CARTER:

15 Q. Can we mark as the next exhibit
16 the few pages at Tab 352?

17 MR. CURRAN: At some point,
18 Mr. Carter, I would like a short
19 break. It doesn't have to be --

20 MR. CARTER: Sure. Let's just
21 take this down and --

22 MR. CURRAN: No, this is a
23 one-page document. How long can that
24 take?

25 MR. CARTER: Unfortunately,

1 it's several pages. It could take a
2 few minutes.

3 MR. CURRAN: Okay. All right.
4 Is it okay to take a break?

5 THE WITNESS: It's okay.

6 MR. CURRAN: Okay. All right.
7 Just say five to seven minutes?

8 MR. CARTER: Sure.

9 MR. CURRAN: Okay. Thank you.

10 VIDEOGRAPHER: Off the record.

11 9:16 a.m. -- p.m. Sorry.

12 (Off the record at 9:16 p.m.)

13 VIDEOGRAPHER: On the record.

14 9:28 a.m. -- p.m., sorry.

15 MR. CARTER: And have we
16 already marked the next document as an
17 exhibit, or did we defer doing that?

18 JON KNOWLES: Yes, sir. Well,
19 I mean, you can change it, if you
20 want, I guess. I mean --

21 MR. CARTER: I think it's
22 already marked as an exhibit from the
23 prior deposition, but so I am going to
24 skip it for now and instead can we
25 mark as the next exhibit the handful

1 of pages at Tab 79?

2 (Al Rajhi Exhibit ARB 57 marked
3 for identification.)

4 QUESTIONS BY MR. CARTER:

5 Q. Mr. Al Rajhi, we only have
6 English versions of these documents. They
7 are annual reports for the Saar Foundation,
8 Inc., the US entity filed in 1994, 1993, 1992
9 and 1991.

10 And if I can, the first
11 document is the first page of the 1994. And
12 then turning to the second page, in the
13 principal officers and directors, there's a
14 reference to Abdullah S. Al-Abdulaziz in the
15 first one. Sorry, above that.

16 Abdullah S. Abdulaziz?

17 A. Yes.

18 Q. Is that you?

19 A. Yeah, this is me.

20 Q. Is there some reason that the
21 document filed with the State of Virginia
22 relating to this company didn't identify you
23 in a way that included your surname Al Rajhi?

24 MR. CURRAN: Objection. Lack
25 of foundation.

1 You may answer.

2 THE WITNESS: Yeah, well,
3 actually from the beginning of when I
4 said Saar started, my father was for
5 himself and for his sons, which is
6 myself and my brother, when it was in
7 the beginning, when Saar started he --
8 he -- you know, there was this concern
9 about -- about privacy and security.

10 So the name was, you know -- I
11 don't know if this was his idea or
12 this is being suggested by the people
13 there, but I know from the beginning,
14 you know, they -- I think it's more or
15 could be mixed, you know, both, you
16 know, privacy and security that, you
17 know, not have the last name.

18 QUESTIONS BY MR. CARTER:

19 Q. Okay. There's some sort of
20 conscious decision made to identify you in a
21 way that didn't include your last name?

22 A. Yes.

23 MR. CURRAN: Objection. Lack
24 of foundation.

25 You may answer.

1 THE WITNESS: Yeah. Yes.

2 QUESTIONS BY MR. CARTER:

3 Q. And below you, the next
4 director listed is Salih Hussvyin in a
5 somewhat unusual spelling.

6 Do you know if that's Saleh
7 Al-Hussayen who we discussed earlier who had
8 served at one time on the Al Rajhi Sharia
9 board?

10 MR. CURRAN: Objection. Lack
11 of foundation.

12 You can answer.

13 THE WITNESS: Yeah, the name --
14 I don't have the names, but it looks
15 like the same name.

16 QUESTIONS BY MR. CARTER:

17 Q. Do you recall whether he was,
18 in fact, Saleh Al-Hussayen, one of the
19 directors of the US Saar entity in the 1994
20 sort of time frame?

21 A. Well, I can't confirm it, but
22 it looks like he's the same one, but I cannot
23 confirm it.

24 Q. Okay. Turning to the next
25 annual report in this group, is the '93

1 report, and again, on the second page of
2 this, the Abdullah S. Abdulaziz reference
3 here is you, correct?

4 A. Must be, yes, the same.

5 Q. Okay. And the Sulaiman A.
6 Al-Saleh identified there, is that your
7 father?

8 A. Yes. Again, without the --
9 without the last name.

10 Q. Okay. So Sulaiman Saleh refers
11 to your father without identifying his last
12 name?

13 A. Yeah, this is Sulaiman A.
14 Abdulaziz and Al-Saleh, which is his
15 grandfather name.

16 Q. In that section, it identifies
17 the address for you as 11919 Safa Court in
18 Herndon, Virginia.

19 Did you ever maintain any
20 residence or office at that address?

21 A. No.

22 Q. You were during this time in
23 Saudi Arabia, right?

24 A. I was in Saudi Arabia, yes.

25 Q. Okay. And the same for your

1 father, did your father have any residence or
2 office at 11919 Safa Court?

3 A. No, I don't think so.

4 Q. So he was in Saudi Arabia at
5 the time, right?

6 A. Yes, right.

7 Q. And now, going back to the
8 document that we had previously started to
9 talk about, which is at Tab 52. There are
10 five pages included in this exhibit that are
11 previously marked as ARB 22.

12 And it's an e-mail in the top
13 page from Abdullah Sulaiman Al Rajhi to a
14 mar-jac.com e-mail address referring to
15 Humana Charitable Trust.

16 Do you see that?

17 A. Yes, I see it.

18 Q. And although it says from
19 Abdullah Sulaiman al Rajhi, it's -- the
20 bottom line says it's coming from someone
21 named Bushra Ahmed.

22 Do you see that?

23 A. Yes.

24 Q. Do you know who Bushra Ahmed
25 is?

1 A. Yeah, that was my secretary at
2 that time.

3 Q. He was your secretary at
4 Al Rajhi Bank?

5 A. He was my secretary at Al Rajhi
6 Bank, yes.

7 Q. And did he work for you in any
8 capacity other than as secretary at Al Rajhi
9 Bank?

10 MR. CURRAN: Objection as to
11 form.

12 You may answer.

13 THE WITNESS: Well, you know,
14 he was my secretary, so he will -- he
15 will -- you know, any -- any letter or
16 e-mail I do from my office, he will
17 handle it.

18 QUESTIONS BY MR. CARTER:

19 Q. Okay. And he was an Al Rajhi
20 Bank employee?

21 A. Yes.

22 Q. And it's addressed to a
23 [REDACTED] and says, "On your fax machine, you
24 are going to receive a letter dated
25 October 18, '99, dually signed by Sheikh

1 Sulaiman along with a three-page list of
2 grants, in Arabic."

3 Do you recall asking your
4 secretary to transmit a letter to [REDACTED]
5 in this November 1999 time frame including a
6 list of grants?

7 A. No, actually, you know, from
8 the beginning, it was always [REDACTED] when
9 he went -- you know, my father doesn't read
10 or speak English, so normally -- and [REDACTED]
11 doesn't speak Arabic. So normally when he
12 wants to communicate things to my father, he
13 will send it to my office for Bushra or, you
14 know, most likely Bushra. Most of the time
15 he -- he communicate these message to my
16 father under the same thing like when it
17 was -- when it was something need to be
18 communicated in writing.

19 Q. Okay. So when [REDACTED]
20 needed to communicate with your father about
21 the work of Humana, his normal course was to
22 reach out to either Bushra or to you at
23 Al Rajhi Bank, correct?

24 MR. CURRAN: Objection. Lack
25 of foundation.

1 You may answer.

2 THE WITNESS: Yeah. Yeah.

3 Well, reach out to me. Not Al Rajhi
4 Bank, reach to me. And then -- then
5 they -- just, you know, for Bushra
6 to -- you know, to make this -- you
7 know, to deliver that message to my
8 father or get that message to my
9 father or, like in this case, you
10 know, letter is signed by my father
11 and he send it back to [REDACTED].

12 QUESTIONS BY MR. CARTER:

13 Q. And do you know whether [REDACTED]
14 [REDACTED] had direct dealings with the personnel
15 in your father's charity office?

16 A. Most likely not because he
17 doesn't speak Arabic, they didn't speak
18 English, as I understand, but I'm not sure if
19 they have some direct contact.

20 Q. Okay. The next page of this is
21 an October 18, 1999 letter to [REDACTED] from
22 Sulaiman A. Al-Saleh.

23 Do you see that?

24 A. Yes.

25 Q. And do you recall arranging for

1 Bushra Ahmed to send this letter to [REDACTED]

2 [REDACTED]

3 A. Just give me, please, a minute
4 just to go through it.

5 Yes, sorry, what was the
6 question?

7 Q. Do you recall arranging for
8 Bushra Ahmed to send this document to [REDACTED]

9 [REDACTED]

10 A. When you say "arrange," you
11 mean I asked Bushra to do it or --

12 Q. Yeah, did you ask Bushra to do
13 it?

14 A. Not necessarily. You know,
15 this -- this could be and could be not.
16 Again, you know, talking about 20 -- you
17 know, it could be -- it could be I am aware
18 about it or it could be that [REDACTED] send it
19 to, you know, my father. You know, this, I
20 would assume, is being drafted by -- by
21 someone maybe in Saar or something like this,
22 and then my father has signed it and asked
23 Bushra to send it.

24 So it could be -- you know,
25 this could be done when I am in the office

1 or -- or not. I can't recall.

2 Q. Okay. And the letter, do you
3 recognize this to be a letter signed by your
4 father?

5 A. Yes.

6 Q. Okay. And it indicates that
7 "during my visit in July of 1998, I explained
8 to you and Mr. Jaghlit that a committee has
9 been set up to receive requests from various
10 charities located throughout the world and
11 then to review, investigate and decide if a
12 charitable contribution will be made."

13 Do you understand that to be a
14 reference to your father's charity office?

15 A. Yes.

16 Q. And it goes on to say, "As we
17 discussed and agreed during your visit in
18 December 1998, Humana Charitable Trust will
19 join in and pay part of these contributions.
20 Attached is a list of grants made and paid by
21 me to various entities sent for reimbursement
22 for your part of the contribution."

23 Do you recall there being an
24 agreement that Humana Charitable Trust would
25 reimburse Sheikh Sulaiman's charity office

1 for portions of the contributions he made
2 during this time period?

3 A. Yes. I recall this was.

4 Q. And so the list of
5 contributions that he's referring to here are
6 contributions that were made by your father,
7 Sulaiman Abdullah Abdul Aziz Al Rajhi,
8 through his charity office, correct?

9 A. Yes, this is what the letters
10 say or what's suggesting.

11 Q. And there is then a three-page
12 list of contributions appended to it.

13 Do you recall seeing this
14 during this time period?

15 A. No, I don't remember this.

16 Q. And there are contributions
17 listed to entities in various parts of the
18 world, the Philippines, Kuwait, Indonesia,
19 United States, Colombia.

20 Do you recall during this
21 period your father was involved in making
22 charitable distributions throughout the
23 world?

24 A. Yeah, my father's charity
25 office was known for many charities around

1 the world that, you know, they write to his
2 charity office to get -- you know, to get
3 some -- for his contributions. So it was --
4 so it was a lot of requests he receive from
5 different organization, charities around the
6 globe.

7 Q. And am I correct that these
8 transfers would have been initiated through
9 Al Rajhi Bank?

10 A. What do you mean by
11 "initiated"?

12 Q. When your father was making
13 contributions, did he generally transfer the
14 money from an Al Rajhi Bank account?

15 A. Yeah, normally the charity
16 office, they have an account with Al Rajhi
17 Bank, and they will do it for Al Rajhi Bank.

18 Q. And just a couple questions
19 about the identities listed here.

20 About two-thirds of the way
21 down the first page, there's a reference to a
22 transfer to Khaled Ibrahim al Suwailem in the
23 Da`wah office in America.

24 Do you know who that is?

25 A. That is -- no, I don't know

1 him.

2 Q. Okay.

3 A. You know, in many cases I would
4 assume my father also doesn't know. I mean,
5 as I said, the request will come to his
6 charity office, the people there, they will
7 check it, review it, and at the time, as I
8 said before, I don't know if it's during this
9 time or -- there's a committee, and that
10 committee will -- again, I don't know whether
11 their role -- they approve or without they're
12 coming to my father or my father get
13 involved, but I would -- but I don't know
14 really how it's -- you know, but I understand
15 that sometime there's a committee in that
16 office, which is not -- not people working
17 who the -- who their job to approve or not
18 approve.

19 Q. And --

20 A. Or to recommend. I don't know.
21 Sorry.

22 Q. Fair to say then that there was
23 a professionalized operation established by
24 your father to deal with the charity requests
25 and determine where to send contributions?

1 A. No, my father, as I said, you
2 know, he had staff working there in the
3 charity, but also he wanted to have -- again,
4 at the time, I'm not aware about it -- where
5 there's a committee just another level of --
6 maybe before him. I would -- you know, I
7 think this will give him more comfort that
8 also being reviewed by maybe someone before
9 the final decision is being made.

10 Q. Did your father personally pick
11 the people who worked in the charity office
12 and served on the committee?

13 A. I would expect, yes, but
14 normally he -- he's the one who will decide,
15 you know, which -- whether it be the
16 committee or the people working there. I
17 mean, the top of mind, but I'm sure he's not
18 involved for other staff working in charity
19 office.

20 (Al Rajhi Exhibit ARB 58 marked
21 for identification.)

22 QUESTIONS BY MR. CARTER:

23 Q. And if we can, mark as the next
24 exhibit the document at Tab Number 64. It's
25 an e-mail from [REDACTED] addressed to

1 Abdullah Sulaiman al Rajhi. And the way it's
2 addressed is "Dear Abu Sultan."

3 Is he referring to you when he
4 uses the Abu Sultan salutation?

5 A. Yes, he refers to me.

6 Q. So in various places in
7 communications with [REDACTED] when there's
8 a reference to Abu Sultan, that's referring
9 to you?

10 A. Yeah.

11 MR. CURRAN: Objection.

12 Overbroad.

13 You may answer.

14 THE WITNESS: Yes.

15 (Al Rajhi Exhibit ARB 59 marked
16 for identification.)

17 QUESTIONS BY MR. CARTER:

18 Q. And [REDACTED] produced a
19 number of checks related to contributions
20 made by your father that were in his custody,
21 and I just want to ask you a few questions
22 about them.

23 The first one is at Tab 53. If
24 we can mark it next.

25 This is a 1999 check payable to

1 Dr. Manei bin Hammad al Johani for 120,000
2 riyals from bin Sulaiman Abdul Aziz al Rajhi.

3 Do you see that?

4 A. This is -- this is a check to a
5 Dr. Manei bin Hammad al Johani.

6 Yes, I see that copy of the
7 checks, yes.

8 Q. Okay. And this is an Al Rajhi
9 Bank check, right?

10 A. This is the checks with
11 personal account with Al Rajhi Bank.

12 Q. And this check is payable to
13 Manei bin Hammad al Johani.

14 Do you know who that is or was
15 at the time?

16 A. No, I don't know him.

17 Q. Do you know whether or not he
18 was an official at the World Assembly of
19 Muslim Youth?

20 A. I don't know.

21 Q. Do you know whether your father
22 had a practice of at times issuing checks to
23 officials of charitable organizations rather
24 than to the charities themselves?

25 MR. CURRAN: Objection. Lack

1 of foundation.

2 You may answer.

3 THE WITNESS: No, I don't know
4 if he's doing this.

5 (Al Rajhi Exhibit ARB 60 marked
6 for identification.)

7 QUESTIONS BY MR. CARTER:

8 Q. And if we can go to the checks
9 at Tab 57.

10 These are three checks payable
11 to the Muslim World League for The Ten Sheep
12 Project.

13 Do you have any idea what The
14 Ten Sheep Project was at that time?

15 A. I think I see now what you
16 covered with the check here. Tell you what,
17 I don't know -- ten --

18 Q. The Ten Sheep --

19 A. Yeah. No, I don't know what is
20 it.

21 (Al Rajhi Exhibit ARB 61 marked
22 for identification.)

23 QUESTIONS BY MR. CARTER:

24 Q. Okay. And if we can mark the
25 document Tab 58.

1 This is a check payable to an
2 individual named Mansour bin Nassir Al Rajhi.

3 Do you know who that is?

4 A. Mansour bin Nassir Al Rajhi, I
5 would think -- yeah, this is -- could be -- I
6 can't confirm 100 percent, but could be
7 someone, you know, Al Rajhi family as --
8 as -- you know, I'm not talking about the
9 four brothers. I'm talking whole family.
10 They have, you know, a kind of, you know, the
11 gathering. They do it, of course, you know,
12 in different cities in the country where
13 some -- some member of the family are
14 meeting.

15 You know, they do these kind of
16 meetings here in Riyadh. They do it in the
17 original town in Naseem. They do it in
18 Jeddah. So Mansour is involved in -- if he's
19 the same person, involved in -- in this --
20 you know, this -- you know, association or
21 whatever you call it.

22 I don't know really what could
23 be the right name, which is just making these
24 family gathering and -- and again, this is
25 before the -- so there's actually -- most

1 likely again I can't -- but there must be a
2 kind of different member of the family, they
3 need a kind of endowment for the benefit of
4 the whole family. And this is what I
5 understand it's -- they help all the member
6 for -- that's endowment to a member of the
7 family when they are in need of help.

8 Q. There's text here associated
9 with it enclosing the check, which indicates
10 that it is a contribution for folks of the
11 Committee for the Promotion of Virtue and the
12 Prevention of Vice.

13 Do you know whether Mansour bin
14 Nassir Al Rajhi had any role at the committee
15 for the --

16 A. I just want to read it, please.
17 Just to understand it.

18 Q. Yeah, sure.

19 A. Yes. No, this must be for
20 something different. This is -- it seems
21 money being given to this individual, you
22 know, as a contribution from Sheikh Sulaiman
23 for -- for this, you know, government entity
24 called Hayta Maroof {phonetic}, which is
25 supposed to make sure that, you know, they

1 apply the order -- the Islamic law.

2 So sorry, what was the
3 question?

4 Q. I was just asking whether or
5 not the Al Rajhi referred to in that had any
6 role to your knowledge at the Committee for
7 the Promotion of Virtue and the Prevention of
8 Vice?

9 A. No, again, I don't understand
10 the question.

11 Q. The donation is for the benefit
12 of the Committee for the Promotion of Virtue
13 and Prevention of Vice, and it's being given
14 to Mansour bin Nassir Al Rajhi.

15 Do you know if he was in some
16 way affiliated with that committee?

17 A. No, I don't know if he's
18 affiliated or not. But this is -- this is
19 government officials, and this is government
20 money, so the money went to them. So I don't
21 know if he has -- he is involved with it.

22 (Al Rajhi Exhibit ARB 62 marked
23 for identification.)

24 QUESTIONS BY MR. CARTER:

25 Q. We can mark as the next exhibit

1 the handful of checks at Tab 98.

2 Mr. Al Rajhi, these are all
3 checks issued from your father's account at
4 Al Rajhi payable to Abdullah bin Ibrahim
5 Al-Misfer, and our understanding is that
6 Abdullah bin Ibrahim Al-Misfer worked in your
7 father's charity office at the time these
8 checks were issued.

9 Take a moment and scroll
10 through them, please.

11 A. Okay.

12 Q. Okay. And in the notes on
13 several of these checks there's indication
14 that the funds are for some other party. The
15 first one indicates that the amount to be
16 sent to the Brother Ahmed Taha.

17 The next says to be handed to
18 propagator Qassim Mohamed from Mali.

19 The other one is for the
20 benefit of propagators in Sierra Leone.

21 Again, do you know whether your
22 father had a practice of issuing checks to
23 individuals in their name for support of
24 other entities?

25 A. Support what?

1 Q. Other entities.

2 A. Other -- I don't know what you
3 mean.

4 Q. The checks indicate that the
5 ultimate beneficiary of several of these
6 payments are not Abdullah Al-Misfer himself
7 but someone else.

8 A. Yes.

9 Q. And do you know in this time
10 period whether your father had a practice of
11 making payments to people in his charity
12 office in their name for them to go
13 distribute the proceeds to a third party?

14 MR. CURRAN: Objection.

15 Foundation.

16 You may answer.

17 THE WITNESS: Yeah, no, I don't
18 know if my father knows about this. I
19 don't know if my father knowing about,
20 you know, this practice or not.

21 You know, because this is what
22 I can see checks being signed by the
23 people managing the charity. If -- I
24 don't know this Abdullah Al-Misfer,
25 but as you say he's working in the

1 charity, then they are signing for
2 someone who is working. And as I
3 said, you know, he put someone.

4 So I don't know if -- if -- you
5 know, if my father was knowing about
6 this or not. I don't know if this
7 is -- you know, was a practice in
8 many -- in other things or only in
9 this one. I have no idea.

10 QUESTIONS BY MR. CARTER:

11 Q. Well --

12 A. Again, going back to, you know,
13 1990 because I looked at the dates. '99, you
14 know, it was -- it was -- I think the trust
15 was totally different than they were today
16 because you cannot expect that, you know,
17 money will go and you give it and this money
18 will be used for bad causes. It's always,
19 you know, people have in mind this money goes
20 there and it will -- you know, it will be
21 used for a good purpose.

22 And definitely there was a lot
23 of trust in an individual at that time, which
24 is, of course, different today.

25 Q. And just to that point, the

1 check at 10423 was in the amount of 235,000
2 Saudi riyals, coming from the charity's
3 account at the bank and issuing to Abdullah
4 Ibrahim Al-Misfer who is an employee of the
5 charity.

6 And you agree with me under
7 that circumstance Ibrahim Al-Misfer could
8 have simply cashed this check?

9 A. You mean for his own personal
10 benefit?

11 Q. Well, I mean, it's written out
12 to him. If he came into the bank, would they
13 have honored it and given him the cash?

14 A. Yeah, if he came to the bank
15 and he's the beneficiary, he would have taken
16 the cash. But again --

17 Q. Where it went from there, the
18 bank wouldn't know?

19 A. Yeah, of course. If he -- if
20 the -- if there's a check in the name of an
21 individual and they take the cash at that
22 time. Of course today, you know, you cannot
23 make personal checks to charities. It's not
24 accepted. This is stopped.

25 But at that time people would

1 have made check -- I think this is in
2 every -- every charity everywhere in the
3 world. You know, they will make a check to
4 an individual. And then I don't know -- and
5 also, again, I'm not -- I don't understand
6 why and how, but -- but we know that some
7 country also -- there's a different country
8 there's always, you know, you need to bring
9 money -- you know, because there's no way to
10 transfer the money through banking system.

11 It's more transferring money
12 for, you know -- through either dollars or
13 whatever currency to give it to them because
14 some of these country, there is not even way
15 to transfer money to. I'm not saying this is
16 the case, but this could be also there.

17 Q. Actually, I'm going to reserve
18 to a little bit of my remaining time, but I
19 do want to ask you just a few questions
20 before turning it over to counsel.

21 There are documents indicating
22 that you were involved in responding to an
23 inquiry from SAMA relating to transactions
24 involving an individual named Omar
25 Al-Bayoumi.

1 Do you recall that at all?

2 A. No, I don't.

3 Q. Do you know who Omar Al-Bayoumi
4 is?

5 A. No, I don't.

6 Q. He is known to have provided
7 support to two of the September 11th
8 hijackers when they arrived in the United
9 States.

10 Were you aware of that?

11 MR. CURRAN: Objection.

12 Foundation.

13 You may answer.

14 THE WITNESS: You know, I --
15 really -- the name -- maybe ring --
16 maybe in this case or in -- his name
17 was there, I have seen this name, but
18 I don't recall details of -- of him.

19 QUESTIONS BY MR. CARTER:

20 Q. And, sir, do you have any idea
21 why Omar Al-Bayoumi would have been
22 contacting the phone number associated with
23 the charity office and then a cell phone
24 associated with Abdullah Al-Misfer during the
25 time period that the hijackers were in the

1 United States?

2 A. No, I do not know.

3 Q. There is an individual named
4 Towayan Al-Towayan.

5 Do you know who that is?

6 A. No, I don't.

7 Q. Or he is -- or he was at one
8 time an employee of Al Rajhi Bank working in
9 the Sharia department.

10 Do you have any understanding
11 of whether Al Rajhi Bank sent him to the
12 United States during the 2000-2001 time
13 period?

14 A. No, I didn't recall that the
15 bank sent him or sent anyone to United States
16 during that time.

17 Q. And Towayan Al-Towayan is
18 believed by the FBI to have had contact with
19 Omar Al-Bayoumi and at least one of the
20 hijackers.

21 Did you in your role at
22 Al Rajhi Bank ever receive any inquiry
23 related to that contact?

24 MR. CURRAN: Objection. Lack
25 of foundation.

1 You may answer.

2 THE WITNESS: You know, at that
3 time there's a lot and a lot of
4 inquiries were received. So I can't
5 now remember, you know, what are the
6 names, but it could be hundreds of
7 inquiry and information. And so -- so
8 it could be, but I can't recall
9 whether he was in any of the lists
10 that we --

11 QUESTIONS BY MR. CARTER:

12 Q. And you're -- do you recall
13 whether there was any inquiry to determine
14 whether Towayan Al-Towayan received unusual
15 financial contributions while he was in the
16 United States from Al Rajhi Bank accounts?

17 A. No. No way that Al Rajhi Bank
18 will -- can you say that? Can you --
19 contributed money to him for what?

20 Q. Well, he had an account at
21 Al Rajhi Bank. I'm asking whether or not you
22 recall there was ever any inquiry that you're
23 aware of directed to the bank concerning
24 funds he received through that account during
25 the 2000-2001 time period?

1 A. Ah, funds he received in his
2 account, no, I'm not aware about it.

3 Q. Were you aware that Saleh
4 Al-Hussayen was in the United States in the
5 days leading up to and through September 11th
6 attacks?

7 A. No, I am not aware.

8 Q. Were you aware that he
9 transferred the hotel he was staying in stay
10 in the same hotel room -- hotel as two of the
11 hijackers on the night before the attacks?

12 A. No, I'm not aware of it.

13 Q. There is information indicating
14 that Saleh Al-Hussayen was in the United
15 States, at least in part, to visit charities
16 in the Herndon, Virginia area during that
17 trip.

18 Are you aware of that?

19 A. No, I am not aware, but from
20 what you are saying now and his name was on
21 the list there, but I'm not aware of it.

22 Q. Do you know whether Saleh
23 Al-Hussayen was in the United States at that
24 time at -- on behalf of your father?

25 A. He was in United States on

1 behalf of my father?

2 Q. Yeah. Do you know whether he
3 was here for -- on behalf of your father
4 and/or your father's request?

5 A. No. No.

6 Q. To investigate charities?

7 A. No, I didn't -- no, I'm not
8 aware, and I don't think so, but I'm not
9 aware, no.

10 Q. And do you recall whether he
11 still had any role working with your father
12 during that time period in 2001?

13 A. I am not aware if -- if he was
14 working at that time with my father.

15 MR. CARTER: We will reserve
16 the remainder of our time. Thank you,
17 Mr. Al Rajhi.

18 THE WITNESS: Thank you,
19 Mr. Carter.

20 MR. CURRAN: All right.
21 Mr. Al Rajhi, I do have some questions
22 for you.

23 First, however, I would like to
24 inform the court reporter that at
25 least my colleagues thing there might

1 have been a couple of errors. We
2 reserve all rights to provide errata.

3 But in particular, at 12:13:14,
4 lines, I think, 253, 24, there's a
5 concern that there was a "no" answer
6 that was indicated as a "yes," and
7 they -- at least on the realtime
8 transcript.

9 And then at 12:19:30, at 259,
10 line 7, there was a concern that the
11 word "you" should be "he."

12 But, again, we reserve rights
13 to provide errata from ourselves and
14 the witness.

15 Now, I would like to ask the --
16 the technician to bring up one
17 particular exhibit. It's been
18 previously marked. It should be found
19 in our Tab 1, and it's previously been
20 marked as ARB 24. It bears the Bates
21 number ARB 39593 and others beyond
22 that.

23 VIDEOGRAPHER: Mr. Curran, if
24 you could speak a little bit closer to
25 the microphone. Your audio is just

1 little been muffled. Thank you.

2 JON KNOWLES: Your Exhibit 1.

3 Where?

4 MR. CURRAN: That's right.

5 Tab 1.

6 JON KNOWLES: Do you have it in

7 the marked exhibit -- in the folder,

8 in your folder under -- logged into

9 or --

10 MR. CURRAN: I believe it's in

11 our folder, Tab 1, it's ARB 24.

12 Previously marked.

13 JON KNOWLES: Okay. I don't --

14 give me a second then. I don't see

15 it. Let me log back into your folder.

16 Hold on.

17 You want to go off the record

18 for a second or you just want to --

19 MR. CURRAN: No, I prefer to

20 continue.

21 JON KNOWLES: Okay.

22 MR. CURRAN: I see it in our

23 folder at Tab 1.

24 All right. Mr. Knowles, you

25 tell me, should we take a short break?

1 Is that necessary?

2 JON KNOWLES: Wait. That's it
3 right there.

4 MR. CURRAN: That's it. Thank
5 you very much.

6 JON KNOWLES: Yes, sir. I got
7 it.

8 CROSS-EXAMINATION

9 QUESTIONS BY MR. CURRAN:

10 Q. All right. So, Mr. Al Rajhi,
11 I'm going to ask you questions about this
12 exhibit. It's a multipage exhibit. It
13 begins with the Bates number ARB 39593 and it
14 continues through 39604. And it's an exhibit
15 that is originally in Arabic and then it has
16 an English translation. You can refer to
17 either at your pleasure.

18 So my first question is, what
19 is the first page you see here?

20 A. First page is a letter. It's
21 sent to Dr. Abdullah al Obaid from -- he's
22 the Secretary of Islamic, I think, World
23 League. Or I'm not sure about the English
24 word. Maybe Islamic World League, I saw that
25 one. It might also what's --

1 Q. Yeah. So who's the letter
2 from?

3 A. From my father.

4 Q. Do you recognize that
5 signature?

6 A. Yes, I do.

7 Q. How do you know that that's
8 your father's signature?

9 A. I know this is his signature.

10 Q. Yeah, how do you know? How do
11 you know it's his signature?

12 A. Because I know his signature.
13 And, you know, signed on top of his name.

14 Q. You've seen his signature many
15 times over the years?

16 A. Yeah, I've seen it -- of cor --
17 yeah, I know his signature well.

18 Q. And in looking at the
19 letterhead, do you recognize the letterhead?

20 A. Yes.

21 Q. What is it the letterhead for?

22 A. This is my father's estate
23 office.

24 Q. Okay. And your father has an
25 estate office?

1 A. Yes. Yeah, he does.

2 Q. What is that?

3 A. Estate office, it's a -- it's
4 one of my company offices, my father offices,
5 which is taking care of all of his real
6 estate businesses.

7 Q. Okay. Is it a personal office
8 that your father has?

9 A. Yes, it is a personal.

10 Q. Is it affiliated with the bank?

11 A. No, it has nothing to do with
12 the bank.

13 Q. At the bottom of this
14 stationery, there's a list of addresses and
15 other contact information.

16 Do you see that?

17 A. Yes, I do.

18 Q. Do you recognize any of those
19 addresses?

20 A. No, I don't.

21 Q. Okay. Are any of them
22 affiliated with the bank?

23 A. No, no, they are not. These
24 aren't even, you know -- have -- if you see
25 in the bottom show what you call it, Chamber

1 of Commerce membership number, the CR number,
2 which are the -- this is different CR. CR,
3 which is commercial registration for the
4 office. So this have different phone,
5 different commercial registration, different
6 Chamber of Commerce membership.

7 Q. And, sir, please take a moment
8 to look at the letter. I'm going to ask you
9 what your understanding of the letter is.

10 A. I think my father here he's
11 sending letter referring to -- and he's
12 informing that he's a number of times
13 provided his -- his resignation as a -- as a
14 board member and also from any committee, and
15 he sent number of letters. The last one was
16 in '98. And he send a copy of his
17 resignation, and he wanted just to --
18 confirming that, you know, his resignation,
19 which as he sent before.

20 Q. And, sir, this letter is dated
21 October 4, 1998, correct?

22 A. Yes. Yes.

23 Q. And in this letter, your father
24 is confirming his prior resignation from the
25 board of trustees of IIRO, correct?

1 A. Right. Yes.

2 Q. And you indicated that this
3 letter attaches copies of prior resignations
4 by your father?

5 A. Yes, that's what the letter
6 say. Yes.

7 Q. Okay. I would like to ask you
8 to scroll through the attachments and tell me
9 if those also appear to you, based on your
10 knowledge, to bear your father's signature
11 and bear the stationery of your father's
12 estate office.

13 A. Yeah, all these are my father
14 signature from the estate office.

15 Q. Okay.

16 A. The letterhead, I mean.

17 Q. Right.

18 And the last attachment here,
19 which I believe is the first-in-time letter.

20 A. Yeah, this one. Yes.

21 Q. Is dated when?

22 A. This is -- this is dated Arabic
23 in the letter. I see in handwrite. 20
24 June 1992.

25 Q. Okay. So based on this

1 exhibit, it appears that your father first
2 resigned from the board of IIRO in or about
3 June 20, 1992?

4 A. Yes.

5 Q. And then thereafter he sent
6 multiple letters to IIRO confirming his
7 resignation?

8 A. Right.

9 Q. You see, sir, at the bottom of
10 this exhibit, there are Bates numbers?

11 A. Yes.

12 Q. And they bear the ARB Bates
13 number?

14 A. Yes.

15 Q. All right. So that indicates
16 that this document came from the files of
17 Al Rajhi Bank.

18 A. All right.

19 Q. Okay. First, do these letters
20 relate at all to bank business?

21 A. No. It's not -- this is from
22 the real estate office. It has nothing to do
23 with the bank.

24 Q. Okay. So do you know why these
25 documents were found and produced from the

1 files of the Al Rajhi Bank?

2 A. Yes, I --

3 MR. CARTER: Objection.

4 THE WITNESS: Yes, this is

5 because of this case, the first -- you

6 know, this case, the first time, this

7 letter came from the estate office for

8 the -- for this case in the first

9 time.

10 QUESTIONS BY MR. CURRAN:

11 Q. Okay. Do you believe that

12 these letters that you've been shown are

13 authentic and genuine letters signed by your

14 father?

15 A. Yes, I do believe.

16 Q. Do you have any indication that

17 they are forgeries or otherwise lacking in

18 genuineness?

19 A. No, I didn't.

20 Q. All right. Please take down

21 that exhibit.

22 So, Mr. Al Rajhi, do you

23 remember where you were on 9/11?

24 A. Yes, I remember. I was -- it

25 was about four o'clock. I was in my office

1 here in Riyadh, in the bank.

2 Q. And what did you think when
3 9/11 happened?

4 A. Well, you know, first when I
5 heard about the news, I thought it was -- you
6 know, it was -- I was surprised. I thought
7 it was an accident, the plane hit to the
8 tower. But of course after the second attack
9 or the second airplane hit the tower, it was
10 very clear that it is a attack, you know;
11 it's not an accident.

12 And of course I was shocked
13 and, you know, sadness, especially when the
14 news started coming and, you know, thousands
15 of people lost their life. And then, you
16 know -- and they would -- so very, very
17 difficult time in their last moment of life,
18 when -- especially when the -- you know, we
19 all see it, the jumping off of towers. So it
20 was really very, very difficult time and they
21 lost a lot of their life.

22 Q. Did you ever discuss 9/11 with
23 your father?

24 A. Yeah, I -- when I have seen him
25 in person after -- after this attack, I

1 discussed it with him, yes.

2 Q. And what was his reaction?

3 A. Well, his reaction, it's -- you
4 know, this is murder. This is a crime. And
5 my father, you know, you go -- I mean, he
6 said at that time, and he said it -- I heard
7 it from, you know -- you know, many, many
8 times, and he said this in front of me and
9 many people who he meets when you talk about
10 these kind of, you know, attacks or these
11 terrorists, any terrorist. You know, he
12 would say, you know -- he always say, and he
13 believe that, you know, if you as an
14 individual kill one innocent person, it's
15 like you are killing the whole humanity. You
16 know, he said it's killing one -- it's like
17 killing the whole humanity.

18 So he was -- and this is,
19 again, either you will hear it from him, many
20 people hear it from him. He was always, you
21 know, repeat this message. And definitely,
22 you know, he seen this as -- as a crime.

23 And of course he doesn't -- he
24 doesn't agree that Osama bin Laden or
25 al-Qaeda, they are representing Islam or

1 acting on behalf of Islam. He always said
2 this many times.

3 Q. Have you ever met Osama bin
4 Laden, or did you ever meet him before he
5 died?

6 A. No, I never met him.

7 Q. Do you know if your father ever
8 met him?

9 A. No, I don't think my father
10 have. Of course I can't -- I can't say for
11 sure, but I'm not aware that my father has
12 seen him or meet him.

13 Q. Are you an extremist Islam
14 follower?

15 A. No, I'm not.

16 Q. Do you support violence or
17 terrorism?

18 A. No, I don't.

19 Q. Is your father an extremist or
20 was he at any time?

21 A. No.

22 MR. CARTER: Objection.

23 THE WITNESS: Yeah, my father
24 is a religious person, but he doesn't
25 support radical or extremist belief.

1 But he's -- he -- he's very religion
2 person, my father. But you talk to
3 him, he -- he's not -- he doesn't
4 support -- he doesn't support these
5 beliefs.

6 QUESTIONS BY MR. CURRAN:

7 Q. Have you ever intended to
8 support Osama bin Laden, al-Qaeda or
9 terrorists, terrorism in any form?

10 A. No way. Never.

11 Actually, you know, in this
12 country we are victim of terrorists. Of
13 course not the same scale as -- as
14 September 11, but my neighbor, he lost his
15 son in one of the terrorist attack here in
16 Riyadh. When he was in one of the compound
17 and the terrorist attack one compound and his
18 son was in that compound and he lost his
19 life.

20 The same thing in Al Rajhi
21 Bank. One of our staff with his family was
22 living in one of these compound, and that
23 compound was -- another attack, was another
24 terrorist attack, and luckily he did not --
25 they were safe, but of course very, very

1 difficult time. He and his wife and his
2 children, so really -- and -- and -- and
3 Al Rajhi Bank, you know, I think about ten
4 years ago, our Jazira branch, you know, there
5 was an attack on our branch, in our branch,
6 and terrorists -- it was, you know, prior --
7 probably and then being proven behind it is
8 the terrorists. And unfortunately --
9 unfortunately we lost -- two our staff lost
10 their life in this accident.

11 So, you know -- you know, we
12 are also -- I mean, you know, we have
13 suffered -- and, I mean, again, it's not the
14 same scale, but these terrorist attack also
15 has happened here in this country.

16 Q. Yeah.

17 To the best of your knowledge,
18 has your father ever supported Osama bin
19 Laden, al-Qaeda or terrorism in any form?

20 A. No, he never.

21 Q. How do you know that?

22 A. Because I know my father. You
23 know, I -- you know, he always -- I worked
24 with him for decades. You know, I've seen
25 him all my life. And I'm not aware of any

1 support he has been giving, you know, for --
2 for someone for -- to do this kind of -- of
3 terrorist or, you know, illegal things.

4 Q. To the best of your knowledge,
5 was anyone at Al Rajhi Bank ever a supporter
6 of Osama bin Laden, al-Qaeda or terrorism in
7 any form?

8 A. No. No one.

9 MR. CARTER: Objection.

10 Foundation.

11 QUESTIONS BY MR. CURRAN:

12 Q. And you've worked at the bank
13 for how many years?

14 A. As I said here, I started
15 from -- since I graduated in 1979. And I
16 left as an executive 2012, and I was on the
17 board after that for some time, and then I
18 was the chairman.

19 Q. Okay. And at the time of 9/11,
20 you were the general manager?

21 A. I was the general manager, yes.

22 Q. Which is equivalent to the CEO?

23 A. Which is equivalent to the CEO,
24 yes.

25 Q. And you were on the board of

1 directors at that time?

2 A. At that time I was on the
3 board, yes.

4 Q. And with all of that
5 supervision of the bank and knowledge of the
6 bank, you're not aware of anyone at the bank
7 who supported Osama bin Laden, al-Qaeda or
8 terrorism in any form?

9 A. I am not aware of anyone
10 supporting any of these things at any time.

11 MR. CURRAN: Mr. Carter, that
12 concludes my testimony -- or my
13 examination of the witness.

14 MR. CARTER: Okay. I have a
15 brief follow-up in light of that.

16 REDIRECT EXAMINATION

17 QUESTIONS BY MR. CARTER:

18 Q. Just begin, Mr. Al Rajhi, you
19 were asked some questions about your reaction
20 to the September 11st attacks as well as your
21 father's reaction.

22 Do you recall that questioning
23 from your counsel?

24 A. Yes.

25 Q. And we've discussed at some

1 length that in the period after the
2 September 11th attacks, it came to light that
3 numerous entities that had accounts at
4 Al Rajhi Bank were involved in providing
5 support to al-Qaeda, including Al-Haramain,
6 correct?

7 A. You know --

8 MR. CURRAN: Objection as to
9 form. Lack of foundation.

10 You may answer.

11 THE WITNESS: I mean, there is
12 some accusation, but I'm not in a
13 position to say this was the case,
14 but -- but I'm not aware of any -- you
15 know, any of these customer had -- you
16 know, had -- other than, you know, the
17 accusation.

18 QUESTIONS BY MR. CARTER:

19 Q. Well, are you aware that the
20 Kingdom of Saudi Arabia, the government of
21 Saudi Arabia, has publically stated that
22 Al-Haramain was notoriously tied to Osama bin
23 Laden and al-Qaeda's terrorism?

24 A. No, I'm aware that Saudi Arabia
25 has closed Al-Haramain, you know, for -- for

1 wrongdoing things. I did not go into details
2 about these things.

3 Q. Okay. Given the accusations
4 about Al-Haramain's involvement in supporting
5 al-Qaeda and the fact that your bank had 95
6 accounts for Al-Haramain during this period
7 and processed over 2 billion riyals in
8 deposits and withdrawals, and given what you
9 said about your reaction to 9/11, why didn't
10 you direct the people at the bank to grab up
11 every piece of paper you had about
12 Al-Haramain to see if there was a problem in
13 relation to the accounts that you maintained
14 for Al-Haramain?

15 A. Mr. Carter, I said before, you
16 know, after September 11, we in the bank, we
17 have send all the information about
18 Al-Haramain to SAMA based on the work. We
19 have send every account, every transaction,
20 and we received a lot of inquiries, you know,
21 about -- about these transaction.

22 And that we -- we are located,
23 we have put resource, staff, just, you know,
24 to -- to -- their job to work with SAMA, send
25 information.

1 And as I said before, we are
2 really proud of the work we have done because
3 we were responding -- responding very fast
4 and sending all the information. And we know
5 these information goes to SAMA and also being
6 discussed and shared with the other
7 countries, especially United States, in
8 dealing with the -- and the timing -- to
9 help.

10 So -- so we have done it. You
11 know, it's not like we did nothing.

12 Q. Well, I'm supposed to have
13 copies of any communications you had with
14 SAMA about Al-Haramain through 2004, and I
15 don't have a stitch of record indicating you
16 provided account information to SAMA about
17 Al-Haramain during that time period.

18 A. You know, again, it's --

19 MR. CURRAN: Objection.

20 THE WITNESS: The way -- yeah,
21 the way it works, these not letters
22 they send it to us. These are, you
23 know, the same -- as I said, you know,
24 they -- you know, we receive -- and
25 actually in sometimes, SAMA people

1 come, you know, because of the
2 importance of the information. They
3 come to us here in our head office,
4 and -- and they sit with our people,
5 and they collect all of the
6 information, and they take it also
7 with them.

8 So it was also not -- also
9 teams from SAMA was -- was also in the
10 bank and dealing with all of these
11 information about Al-Haramain and
12 about other charities and other
13 individuals.

14 The bank was always very
15 good -- cooperating and doing. And
16 not only that, but also for our
17 lawyers go back, you know, to -- to I
18 think 2000 -- not 2000 -- '02 or '3,
19 you know, what the case, they came to
20 us, they asked -- you know, the US
21 government, they wanted some
22 information from our lawyers. And we
23 made this information available
24 through, of course, SAMA because we
25 have to give to SAMA. We made it

1 available to the US government at that
2 time.

3 So I think it's not fair that
4 you say that we did not do anything or
5 were not cooperating. We have done
6 everything we can do to help and --
7 and, you know, give whatever
8 information needed to deal with this
9 big, big, you know --

10 QUESTIONS BY MR. CARTER:

11 Q. Mr. Al Rajhi, I have limited
12 time. And, again, I'm supposed to have
13 copies of any information relating to
14 engagements with SAMA about Al-Haramain.

15 I'm telling you that I don't
16 have any records indicating that any
17 information was provided to SAMA about
18 Al-Haramain through the 2004 period.

19 So if you have documentation
20 indicating that there was some information
21 provided, I'd ask that you get it to me.

22 MR. CURRAN: Objection as to
23 form.

24 I don't know if that's a
25 question, but if it is, objection as

1 to form.

2 The witness has already

3 addressed that, Mr. Carter.

4 QUESTIONS BY MR. CARTER:

5 Q. And we will shift very quickly.

6 Going back to the series of

7 letters that Mr. Curran discussed from your

8 father to officials at the Muslim World

9 League.

10 A. Yes.

11 Q. Okay. And if you go to the

12 first in that series, the '92 letter, there's

13 a reference to the fact that your father at

14 some point prior to that letter had, in fact,

15 accepted an invitation to be a member of the

16 Constituent Assembly of the IIRO and a member

17 of the Supreme Investment Council.

18 Is that consistent with your

19 understanding?

20 A. I need just to go --

21 MR. CURRAN: It's up on the

22 screen now.

23 THE WITNESS: Here in English.

24 QUESTIONS BY MR. CARTER:

25 Q. It's the -- it's the letter at

1 39603 through 39604.

2 A. These are the same letter?

3 MR. CURRAN: Yes, this is

4 Arabic; that's the English.

5 THE WITNESS: Ah. Okay. So

6 what's the question?

7 QUESTIONS BY MR. CARTER:

8 Q. Okay. In the second to the
9 last paragraph there, he says that "he
10 acknowledges that he had previously accepted
11 to be a member of the Constituent Assembly of
12 the Islamic Relief Organization based on your
13 valued invitation and to be a member of the
14 Supreme Investment Council."

15 Do you see that?

16 A. No, I think -- can you please
17 go through it again just to -- can you
18 highlight it or -- yeah, okay. Here.
19 According --

20 Q. Above that. The paragraph
21 above that.

22 A. Yeah, it is no secret...

23 MR. CURRAN: The question is
24 was he a member before he resigned. I
25 think that's the question.

1 THE WITNESS: Was he a member
2 before he resigned?

3 MR. CURRAN: Yeah.

4 THE WITNESS: Before resigned,
5 he was a member. Yeah, he --

6 QUESTIONS BY MR. CARTER:

7 Q. So at one time he was a member
8 of the Constituent Assembly of the IIRO and
9 of the Supreme Investment Council, correct?

10 A. Yes, before he resigned.

11 Q. And if you go to the August 19,
12 1996 letter at 39598, there is a reference
13 there to your father's shares in Sanabel Al
14 Khair Company for Commercial and Industrial
15 Investments.

16 Do you see that?

17 A. Yes, I see it.

18 Q. Do you know what Sanabel Al
19 Khair was?

20 A. No, I don't.

21 Q. Was Sanabel Al Khair an
22 investment company to generate revenue for
23 IIRO?

24 A. I don't know. I'm not familiar
25 with it.

1 Q. And do you know whether or not
2 your father ever made any contribution to an
3 investment arm that was established to
4 generate revenue for IIRO?

5 A. I don't know about it.

6 Q. And do you know whether or not
7 by virtue of having made an investment and
8 being a shareholder he was necessarily
9 included as a member of the Investment
10 Council of the IIRO?

11 A. I -- no, I don't know. I'm not
12 familiar in how -- how this -- how it works.
13 It's not close to me. I'm not familiar with
14 it.

15 Q. And if we can go to the
16 document at Tab 77 in our group of documents.
17 We'll mark it as the next exhibit.

18 MR. CURRAN: Is that within the
19 scope of my examination, Mr. Carter?

20 MR. CARTER: It is.

21 MR. CURRAN: Okay.

22 MR. CARTER: I understand your
23 examination to have addressed Mr. Al
24 Rajhi's relationship with the IIRO
25 post-1992. And this is a --

1 THE WITNESS: Yeah.

2 MR. CARTER: Sulaiman.

3 MR. CURRAN: Okay.

4 (Al Rajhi Exhibit ARB 63 marked
5 for identification.)

6 QUESTIONS BY MR. CARTER:

7 Q. And, Mr. Al Rajhi, this is a
8 document we received from the IIRO in
9 discovery dated 1995 which refers to a
10 delegation sent by the Director General of
11 the IIRO, and the team going included Ahmad
12 Totonji, Sheikh Saleh Al-Hussayen, Sheikh
13 Abdul Rahman Al Rajhi, Sheikh Saleh Al-Habdan
14 and Abdullah Al-Misfer.

15 Do you see that?

16 A. Yes, I see it.

17 Q. And Ahmad Totonji is listed on
18 the documents we looked earlier as a director
19 of the US Saar Foundation?

20 A. Yes.

21 Q. And Sheikh Saleh Al-Hussayen,
22 as we recall, was also a director of the US
23 Saar Foundation?

24 A. Yes.

25 Q. And Sheikh Abdul Rahman al

1 Rajhi was one of the principals of your
2 father's charity office?

3 A. Yes.

4 Q. And Sheikh Saleh Al-Habdan was
5 both the imam of the Al Rajhi mosque and a
6 representative of your father's charity
7 office?

8 A. Here I'm not sure -- I'm not
9 sure here if they are representing, but here
10 if they're saying for Al Rajhi -- I think
11 this is -- I'll say maybe I listen to your
12 question. Go ahead, please.

13 Q. Yeah, Sheikh Saleh Al-Habdan,
14 who is referenced here, was the imam of Al
15 Rajhi mosque and a representative of your
16 father's charity office?

17 A. Yeah, this is -- this is a
18 letter from -- from IIRO and chief of
19 protocol, and they ask -- they're sending it
20 to government in Dar es Salaam. So I think
21 he introduced them. You know, he introduced
22 them with the -- you know, with this title,
23 imam of Al Rajhi mosque.

24 Because Abdul Rahman Al Rajhi,
25 he put him here as a businessman.

1 Q. Yeah.

2 And Abdullah Al-Misfer, we've
3 already covered, was also a representative of
4 your father's charity office?

5 A. He said here Medina. The
6 representative of Medina University. So
7 here -- here on this letter, they are -- they
8 are referring to him as -- as ex-minister.
9 So they are -- yeah. This is, again, IIRO
10 letter sent to someone there, which is --
11 which is showing their -- you know, their
12 name and their introduction by, you know --
13 by giving them -- you know, putting
14 different -- different title for each one.

15 Q. Yeah.

16 So this is a delegation sent by
17 the Director General of the IIRO that
18 included two individuals who were directors
19 of the US Saar Foundation and three
20 individuals who were representatives of your
21 father's charity office, right?

22 MR. CURRAN: Objection. Lacks
23 foundation.

24 You may answer.

25 THE WITNESS: Yes, these two

1 people, they're working for my father,
2 Abdul Rahman Al Rajhi and Saleh
3 Al-Habdan.

4 MR. CARTER: That's all I have.
5 Thank you.

6 RECROSS-EXAMINATION

7 QUESTIONS BY MR. CURRAN:

8 Q. Well, I have some follow-up to
9 that. So -- in particular follow-up to
10 Mr. Carter's question or assertion that he
11 did not get a stitch of information produced
12 in discovery.

13 So, Mr. Al Rajhi, are you
14 familiar with the SSC, the SAMA
15 Self-Supervisory Committee?

16 A. Yes.

17 Q. And that was a committee formed
18 under the auspices of SAMA after 9/11?

19 A. Correct, yes.

20 Q. And it had representatives of
21 all of the major banks in Saudi Arabia?

22 A. Including Al Rajhi Bank.

23 Q. Okay. And that committee,
24 including the Al Rajhi Bank representative on
25 that committee, coordinated closely with SAMA

1 with respect to post-9/11 investigations,
2 correct?

3 A. Yes, this is correct.

4 Q. Okay. And those were extensive
5 meetings and investigations under the
6 auspices of SAMA, correct?

7 A. Yes.

8 MR. SHEN: Form.

9 QUESTIONS BY MR. CURRAN:

10 Q. So if Al Rajhi Bank in this
11 litigation produced all of its correspondence
12 with SAMA and with respect to the SSC, then
13 Mr. Carter would be wrong saying he didn't
14 have a stitch of information about the bank's
15 post-9/11 cooperation with SAMA?

16 A. Yes.

17 MR. SHEN: Objection to form.

18 MR. CURRAN: No further
19 questions.

20 I would like to thank you the
21 technicians and the videographer and
22 the court reporter and the various
23 interpreters for their cooperation and
24 patience today. Thank you all very
25 much. The deposition is concluded.

1 MR. CARTER: Thank you.

2 JON KNOWLES: Thank you.

3 MR. CARTER: Thank you, Mr. Al

4 Rajhi.

5 VIDEOGRAPHER: Off the record.

6 10:42 p.m.

7 (Deposition concluded at 10:42 p.m.)

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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered
Diplomate Reporter, Certified Realtime
Reporter and Certified Shorthand Reporter, do
hereby certify that prior to the commencement
of the examination, Abdullah bin Sulaiman Al
Rajhi, was duly sworn by me to testify to the
truth, the whole truth and nothing but the
truth.

I DO FURTHER CERTIFY that the
foregoing is a verbatim transcript of the
testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

Carrie A. Campbell

—
CARRIE A. CAMPBELL,
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Notary Public
Dated: September 30, 2023

1 INSTRUCTIONS TO WITNESS

2

3 Please read your deposition over
4 carefully and make any necessary corrections.
5 You should state the reason in the
6 appropriate space on the errata sheet for any
7 corrections that are made.

8 After doing so, please sign the
9 errata sheet and date it. You are signing
10 same subject to the changes you have noted on
11 the errata sheet, which will be attached to
12 your deposition.

13 It is imperative that you return
14 the original errata sheet to the deposing
15 attorney within thirty (30) days of receipt
16 of the deposition transcript by you. If you
17 fail to do so, the deposition transcript may
18 be deemed to be accurate and may be used in
19 court.

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25

ACKNOWLEDGMENT OF DEPONENT

I, _____, do
hereby certify that I have read the foregoing
pages and that the same is a correct
transcription of the answers given by me to
the questions therein propounded, except for
the corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

Abdullah bin Sulaiman Al Rajhi DATE

Subscribed and sworn to before me this
_____ day of _____, 20 ____.

My commission expires: _____

Notary Public

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LAWYER'S NOTES

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ERRATA

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NAME OF CASE: *In Re: Terrorist Attacks On September 11, 2001*, No. 03-md-1570 (S.D.N.Y.)

DATE OF DEPOSITION: September 27, 2023

NAME OF DEPONENT: Abdullah bin Sulaiman Al Rajhi

Page	Line(s)	Change	Reason
18	5	Replace "somewhere" with "a summer"	Transcription error
18	14	Replace "a" with "I"	Transcription error
19	6	Add ", but I am not an employee of the bank" after "board"	Clarification
19	17	Replace "also a" with "our"	Transcription error
20	10	Replace "regular" with "in the"	Transcription error
21	21	Add "risk the" after "the"	Transcription error
21	22	Replace "have" with "of"	Transcription error
22	6	Replace "So" with "Sorry"	Transcription error
23	4	Replace "hear" with "heard"	Transcription error
24	13	Add "personally" after "involved"	Transcription error
25	15	Replace "There's" with "Himself with his"	Transcription error
25	18	Delete "other"	Transcription error
26	5	Replace "early 80's" with "very early"	Transcription error
27	5	Add "graduate" after "the"	Transcription error
28	3	Add "Glyfada, in" after "Citibank in"	Transcription error
28	4	Add "full" after "a"	Transcription error
28	10	Add ", economics" after "subject"	Transcription error
28	10	Replace "- - tens of" with "ten, ten intensive"	Transcription error
29	21	Replace "help" with "helping"	Transcription error
30	8	Replace "supervising" with "incentivizing"	Transcription error
30	11	Replace "at the --" with "like the other one" and replace "you're there for what" with "you learn from what"	Transcription error
30	12	Replace "show" with "shown"	Transcription error
30	13	Replace "risky" with "at the university"	Transcription error
30	11	Replace "you're there for what" with "you learn from what"	Transcription error
30	18	Replace "for" with "through"	Transcription error
30	23	Add "of course" after "Yes,"	Transcription error
31	11	Replace "in" with "you mean"	Transcription error
32	4	Replace "the" with "terrorist"	Transcription error
32	5	Replace "this" with "terrorist"	Transcription error
32	21	Add "--" after "almost"	Transcription error

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Page	Line(s)	Change	Reason
32	23	Replace "there" with "I"	Transcription error
33	4	Delete "member"	Clarification
34	13	Delete "an"	Transcription error
34	14	Replace "interview" with "introduced a"	Transcription error
34	18	Add "best-in" after "third-party"	Transcription error
34	19	Replace "did" with "do"	Transcription error
34	20	Replace "analysis" with "policies"	Transcription error
34	22	Replace "business" with "best"	Transcription error
34	25	Replace "At" with "And"	Transcription error
35	1	Replace "to the" with "it in the management"	Transcription error
35	3	Replace "the" with "three"	Transcription error
35	4	Add "governance committee" after "this"	Clarification
37	4	Add "years ago" after "20"	Clarification
37	14	Replace "was" with "is"	Transcription error
40	5	Replace "who" with "two"	Transcription error
40	20	Replace "coming in" with "became a listed company"	Transcription error
42	2	Replace "projects" with "of branches"	Clarification
44	3	Add "go and" after "Just"	Transcription error
44	15	Replace "corresponding" with "correspondent"	Transcription error
44	17	Replace "they" with "I"	Clarification
45	11	Add "organization structure" after "new"	Transcription error
46	6	Replace "remember" with "know the number" and add "in" after "but"	Transcription error
46	10	Add "in" after "it's"	Transcription error
47	19	Replace "and that's only" with "industry, always,"	Transcription error
48	4	Replace "that" with "there"	Transcription error
50	18	Add "requirement" after "Specific"	Transcription error
50	13	Replace "didn't" with "don't"	Transcription error
51	18	Add "or indirectly" after "directly"	Transcription error
52	11	Replace "report" with "reports"	Transcription error
52	14	Replace "from" with "above"	Clarification
54	6	Replace "don't" with "do now"	Transcription error
54	13	Add "banks" after "Saudi" and delete "to"	Clarification
54	21	Replace "Marketing" with "Market"	Transcription error
54	24	Add "requirements" after "these"	Transcription error
54	25	Replace "training" with "really"	Transcription error
55	16	Replace "2021" with "2001"	Transcription error
56	2	Replace "Well, again" with "Again"	Transcription error
57	15	Replace "we had" with "during that time"	Transcription error
58	6	Replace "and their" with ", know your"	Transcription error
59	4	Add "internal" after "of the"	Transcription error
59	5	Replace "we go on to" with "they go and do"	Transcription error
59	5	Replace "auditing" with "audit in"	Transcription error
59	18	Replace "it's a" with "it"	Transcription error
59	21	Replace "we" with "they"	Transcription error

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Page	Line(s)	Change	Reason
59	24	Replace "the" with "this"	Transcription error
59	25	Replace "down" with "plan"	Transcription error
60	1	Replace "forecast" with "focus"	Transcription error
60	5	Delete "there"	Transcription error
60	6	Replace "become" with "becoming" and replace "importance" with "important"	Transcription error
60	6	Replace "laundry" with "laundering"	Clarification
60	7	Replace "laundry" with "laundering"	Clarification
60	9	Add "or" after "today"	Transcription error
61	10	Replace "with an" with "when"	Transcription error
61	11	Replace "the words" with "reports"	Transcription error
64	8	Replace "acquired" with "inquired"	Transcription error
65	5	Add "playing the role of" after "always -- always"	Transcription error
66	5	Replace "suspicious" with "suspicious"	Clarification
66	24	Add "all" after "answering"	Transcription error
67	4	Replace "differently" with "definitely"	Transcription error
67	7	Add "answers" after "the"	Clarification
67	9	Replace "with" with "to"	Clarification
67	18	Add "," after "needed"	Transcription error
70	8	Replace "—" with "top,"	Transcription error
70	19	Replace "the" with "AI"	Transcription error
70	20	Add "branches" after "Haramain"	Clarification
71	18	Add "did" after "It"	Transcription error
76	16	Replace "We" with "But we"	Transcription error
76	18	Add "when it" after "especially"	Transcription error
76	19	Add "about" after "or"	Transcription error
78	3	Replace "can't just" with "just go and"	Transcription error
78	5	Replace "different" with "definitely"	Transcription error
80	13	Replace "at this" with "it is" and replace "at this" with "it is"	Transcription error
80	14	Replace "want to" with "will not" and replace "and then" with "in"	Transcription error
80	15	Replace "serious" with "series" and replace "differently" with "definitely"	Transcription error
80	24	Add "all" after "give"	Transcription error
80	25	Replace "ask" with "been asked"	Transcription error
81	7	Replace "wanted" with "went, you know"	Transcription error
81	8	Delete "go to"	Transcription error
81	13	Add "about" after "was"	Clarification
81	13	Add "outside Saudi" before "-- so" and add "coming" after "were"	Transcription error
81	17	Replace "instruction." with "instruction?"	Transcription error
82	9	Add "out" after "reach"	Transcription error
82	25	Add "reality" after "is the"	Transcription error
83	7	Replace "payments" with "permit still available"	Transcription error
83	8	Replace "." with "?"	Transcription error

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Page	Line(s)	Change	Reason
84	18	Add "-- whether we continue this"	Transcription error
85	7	Replace "didn't" with "don't"	Transcription error
85	8	Replace "we" with "when"	Transcription error
85	11	Replace "lost" with "closed"	Transcription error
85	12	Replace "data" with "later"	Transcription error
88	15	Replace "I can't specifically" with "it's difficult to"	Transcription error
88	16	Delete "right"	Transcription error
88	22	Add "the" after "SAMA"	Transcription error
89	1	Replace "see circular" with "receive instruction"	Transcription error
89	4	Add "payment" after "only"	Transcription error
90	21	Replace "circular" with "instruction"	Transcription error
91	10	Replace "can do that" with "could do or not"	Transcription error
91	12	Replace "Part" with "On the part"	Clarification
91	14	Replace "would like -- as ours" with "would -- like, as always --"	Transcription error
91	14	Replace "ours" with "always"	Transcription error
91	15	Replace "with the regulator" with "any regulation"	Transcription error
91	22	Replace "But" with "Right"	Transcription error
92	3	Replace "simple action" with "proaction"	Transcription error
92	4	Add "the work," before "if the bank," and replace "consent" with "concerns"	Transcription error
93	8	Add "according" after "--"	Transcription error
94	3	Replace "get" with "they"	Transcription error
94	7	Replace "it's a really" with "there's any"	Transcription error
94	8	Replace "of" with "for"	Transcription error
94	9	Replace "are" with "or"	Transcription error
94	9	Replace "it would" with "will"	Transcription error
94	18	Replace "approving" with "approval"	Transcription error
95	17	Add "account" after "problematic"	Clarification
95	18	Remove the comma after "charity"	Transcription error
96	24	Add "the accounts of" after "of"	Transcription error
98	2	Replace "anyone thinks are" with "any wrong things or"	Transcription error
98	3	Replace "news" with "used"	Transcription error
98	6	Replace "to the big banks and take" with "from the beginning sending"	Transcription error
99	5	Add "good one," after "international,"	Transcription error
101	7	Add "for these specific accounts" after "it"	Clarification
104	25	Replace "we" with "let me"	Transcription error
105	2	Replace "that we have" with "in Riyadh"	Transcription error
105	9	Replace "total" with "two"	Transcription error
105	15	Replace "it says" with "deposits, that's" and add "I see there" after "number"	Transcription error
106	6	Replace "it is" with "-- eight years"	Transcription error
108	3	Add "other" after "any"	Transcription error
108	5	Replace "all" with "our"	Transcription error
108	13	Replace "when" with "accused of any wrongdoing"	Transcription error

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Page	Line(s)	Change	Reason
108	14	Replace "." with "?"	Transcription error
108	16	Replace "in" with "any"	Transcription error
108	20	Replace "it" with "that charity"	Clarification
108	22	Add "stuff" after "positive"	Transcription error
109	17	Replace "the" with "to"	Transcription error
109	22	Replace "suspicious" with "suspensions"	Transcription error
110	5	Add "to SAMA" after "back"	Clarification
110	23	Add "direct" after "a"	Transcription error
111	2	Replace "no information" with "no. The information"	Transcription error
112	3	Add "letters" after "these"	Clarification
112	3	Add "from me" after "went"	Transcription error
112	4	Add "specific audit" after "this"	Clarification
113	1	Replace "enrollment" with "improvement"	Transcription error
113	2	Add "for these accounts, I don't remember" after "Specifically"	Clarification
115	24	Replace "amount" with "account"	Transcription error
116	12	Add "have" after "could" and delete "but"	Transcription error
116	13	Delete "not"	Transcription error
116	19	Replace "we" with "they"	Transcription error
116	21	Add "compliance" after "about"	Clarification
116	22	Replace "before, you" with "before. You"	Transcription Error
116	23	Replace "themselves like this" with "it has an excellent compliance standard"	Clarification
116	24	Add "advise us so" after "and"	Clarification
117	3	Replace "have created" with "upgrade our"	Transcription error
117	8	Add "in the top" between "are" and "--"	Transcription error
121	14	Replace "of" with "if"	Transcription error
121	18	Add "the" after "be" and "of" after "operation" and "with SAMA inquiries" after "things"	Clarification
121	18	Add "if" after "then"	Clarification
121	24	Replace "I need" with "any"	Transcription error
121	25	Replace "details because" with "details. Because" and delete "over"	Transcription error
122	4	Replace "relocated" with "allocated"	Transcription error
122	10	Add "for" before "any"	Clarification
123	5	Add "," after "likely" and "years" after "20"	Clarification
123	6	Replace "in charity" with "about charities"	Transcription error
124	5	Replace "2000" with "2004"	Clarification
125	2	Replace "I" with "you"	Transcription error
125	3	Delete "it"	Transcription error
125	20	Replace "of course" with "it goes --"	Transcription error
126	4	Delete "a"	Transcription error
126	5	Replace "little bit" with "any"	Transcription error
126	10	Replace "given to" with "beyond"	Transcription error
127	18	Add "all" after "check"	Clarification
128	4	Replace "think" with "-- myself"	Transcription error

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Page	Line(s)	Change	Reason
128	4	Add "aware" after "not"	Clarification
128	8	Replace "did" with deal	Transcription error
128	8	Replace "for" with "any other"	Transcription error
128	9	Replace "for" with "of a"	Transcription error
130	2	Replace "didn't" with "don't"	Transcription error
133	20	Replace "Jabur {phonetic}" with "Al-Jarbou"	Transcription error
134	15	Replace "that be" with "being there that mean"	Transcription error
134	17	Add "for" after "supervision,"	Transcription error
135	10	Replace "and some section" with "in some reception"	Transcription error
135	23	Replace "that I" with "whether he"	Transcription error
137	12	Add "they said" after "Here"	Transcription error
137	16	Replace "didn't" with "don't" and replace "was" with "word is"	Transcription error
137	22	Replace "all involved" with "opened"	Transcription error
137	23	Replace "That's all I know it's" with "Plus, as I said, the noise"	Transcription error
138	2	Replace "office" with "or fresh"	Transcription error
139	13	Add "11" after "September"	Transcription error
143	17	Replace "didn't" with "really"	Transcription error
143	20	Add "governance" after "have"	Clarification
146	23	Replace "maybe it is -- so" with "may the peace be ... So"	Transcription error
148	19	Add "--" after "Islamic"	Transcription error
149	9	Replace "they" with "we"	Transcription error
149	10	Add "other" after "have" and add "Ministry" after "from"	Transcription error
149	24	Replace "at least" with "these"	Transcription error
151	12	Replace "attention and to" with "general manager of"	Transcription error
153	6	Add "I don't know." before "Maybe"	Transcription error
154	4	Replace "Ministry" with "Minister"	Transcription error
154	10	Replace "date do" with "the year"	Transcription error
155	19	Add "Islamic Foundation" before "attached"	Transcription error
156	20	Replace "directors" with "director"	Transcription error
156	21	Replace "are --" with "is Aqeel Ibn Aqeel"	Transcription error
156	21	Replace "letters say" with "letter is saying"	Transcription error
157	13	Replace "You" with "No, he" and replace "not. It" with "not. This"	Transcription error
157	14	Replace "did" with "does" and "this here" with "that he had"	Transcription error
157	15	Replace "the" with "Al"	Transcription error
157	23	Replace "done" with "dealt" and replace "letter" with "related"	Transcription error
161	8	Replace "the" with "under"	Transcription error
161	23	Add "in" after "maybe"	Transcription error
162	8	Add "Al" before "by"	Transcription error
162	12	Replace "in" with "to"	Transcription error
162	19	Replace "Hijri" with "here"	Transcription error
163	19	Replace "of" with "if"	Transcription error

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Page	Line(s)	Change	Reason
163	20	Replace "agrees" with "employees went"	Transcription error
164	23	Replace "say" with "is saying"	Transcription error
164	24	Replace "say" with "is saying"	Transcription error
165	5	Delete "a"	Transcription error
165	24	Replace "to" with "in"	Transcription error
167	7	Replace "it went to" with "they put"	Transcription error
167	11	Replace "Yanbu, Yanbu" with "Yanbu, from Yanbu" and then add "District" after "Yanbu, from Yanbu"	Transcription error
167	12	Replace "on behalf" with "or" and add "on behalf" after "Yanbu", and replace "it does say" with "or Yanbu let us say"	Transcription error
167	13	Replace "for sure" with "what's the right English word"	Transcription error
169	1	Replace "don't" with "didn't"	Transcription error
170	3	Replace "They" with "And me"	Transcription error
170	18	Add "Here they put" before "Abdul-Aziz"	Transcription error
171	3	Replace "that is" with "he addressed it with"	Transcription error
171	11	Replace "Tabuk affairs" with "the Tabuk governance."	Transcription error
172	3	Replace "prince" with "minister"	Transcription error
174	3	Add "addressed to" after "Yeah,"	Transcription error
175	2	Add "as the" after "same"	Clarification
175	6	Replace "send" with "responsible"	Transcription error
175	8	Replace "usual" with "unusual"	Transcription error
175	11	Replace "at" with "in"	Transcription error
176	9	Replace "that we" with "let me"	Transcription error
177	23	Replace "mean" with "need"	Transcription error
178	3	Replace "So it" with "Sorry, what"	Transcription error
179	12	Replace "could be" with "copy"	Transcription error
180	8	Add ", how they operate" after "things"	Transcription error
180	13	Replace "say" with "saying"	Transcription error
180	22	Replace "so" with "and also"	Transcription error
181	8	Add "will" after "you"	Transcription error
181	9	Replace "under" with "in this"	Transcription error
182	2	Add "have" after "they"	Transcription error
182	3	Add "purpose" after "Al-Haramain"	Transcription error
183	8	Delete "just"	Transcription error
183	9	Replace "want" with "responsibility"	Transcription error
184	2	Replace "apply" with "applied"	Transcription error
185	10	Add "ultimately" after "these"	Transcription error
186	6	Replace "find" with "if there's"	Transcription error
186	15	Replace "they" with "I"	Transcription error
186	16	Replace "can't" with "can"	Transcription error
186	17	Replace "can't" with "can"	Transcription error
186	18	Replace "can't" with "can"	Transcription error
186	22	Replace "believe myself it" with "repeat myself. It"	Transcription error
186	23	Add "are" after "things"	Transcription error
187	1	Replace "." with ","	Transcription error

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Page	Line(s)	Change	Reason
187	2	Replace "This" with "is this"	Transcription error
187	3	Replace "that" with "and then"	Transcription error
187	4	Replace "collect" with "correct"	Transcription error
188	3	Replace "what did" with "it,"	Transcription error
188	4	Replace "happen" with "I don't have the details of it"	Transcription error
188	5	Add "Definitely" before "if"	Transcription error
188	24	Add "they'd written" after "general manager and"	Transcription error
191	19	Replace "in" with "one moment please"	Transcription error
191	20	Delete "that case"	Transcription error
192	20	Replace "departure from the client" with "you know, this term, a departure from required"	Transcription error
193	1	Replace "problems" with "practice"	Transcription error
193	2	Replace "data" with "direct, straight way"	Transcription error
193	2	Replace "the way" with "or the direct way"	Transcription error
193	4	Replace "this" with "there's a" and replace "been" with "being"	Transcription error
193	24	Replace "about" with "if another"	Transcription error
194	6	Replace "that, the" with "the other"	Transcription error
194	10	Replace "another" with "in the other"	Transcription error
196	9	Replace "to" with "from"	Transcription error
196	18	Replace "we open account" with "when they come and open"	Transcription error
196	23	Replace "they" with "I"	Transcription error
197	1	Replace "if" with "for when"	Clarification
197	2	Add "if" after "want --" and add "want" after "customer"	Transcription error
197	7	Replace "another" with "-- it's the other"	Transcription error
197	15	Replace "names. If" with "names if"	Transcription error
197	21	Replace "keeping to the" with "rather than keeping the old"	Transcription error
198	11	Replace "best of use" with "customers"	Transcription error
198	12	Replace "it is not" with "this is"	Transcription error
199	3	Replace "taking over" with "representing"	Transcription error
199	4	Replace "the bank" with "in the banking"	Transcription error
199	5	Replace "existed" with "system"	Transcription error
199	5	Replace "really huge bank, big bank, big bank." With "really huge bank, big bank, retail bank."	Transcription error
199	7	Add "we are" after "But again,"	Transcription error
200	2	Replace "they" with "I"	Transcription error
200	3	Add "here" after "see"	Transcription error
201	2	Replace "Withdraw" with "I withdraw"	Transcription error
201	6	Add "it" after "see"	Transcription error
201	10	Replace "letter is" with "addressed"	Transcription error
201	18	Replace "you're" with "to be" and add "to you" after "referring to"	Transcription error
201	24	Add "mistake" after "think it's a"	Transcription error
202	5	Italicize the Arabic word <i>'akh</i>	Transcription error

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Page	Line(s)	Change	Reason
202	10	Replace "I don't know" with "Ah, no"	Transcription error
202	13	Replace "recognition" with "in English"	Transcription error
202	15	Replace "then this very" with "and address me"	Transcription error
202	15	Replace "this letter" with "these letters"	Transcription error
202	17	Replace "come" with "going"	Transcription error
203	8	Replace "Jarbu" with "Jarbou"	Transcription error
203	12	Replace "Jarbu" with "Jarbou"	Transcription error
203	14	Replace "whatever --" with "what's -- put"	Transcription error
203	19	Add "in" after "be"	Transcription error
204	5	Replace "Jarbu's" with "Jarbou's"	Transcription error
204	21	Replace "him" with "them"	Transcription error
205	10	Replace "are having" with "Al-Haramain"	Transcription error
205	12	Replace "didn't" with "really don't"	Transcription error
206	7	Replace "Jarbu" with "Jarbou"	Transcription error
206	8	Replace "Jarbu" with "Jarbou"	Transcription error
206	13	Add "Approval" before "for"	Transcription error
206	16	Replace "move it toward" with "put the word"	Transcription error
206	21	Replace "how would we do it" with "he would put urgent"	Transcription error
206	23	Replace "see" with "say urgent"	Transcription error
210	10	Replace "Hamad" with "Rahman"	Transcription error
211	5	Replace "seconds" with "minutes"	Transcription error
212	25	Replace "Arabic" with "April"	Transcription error
213	10	Replace "then" with "April"	Transcription error
214	4	Replace "Medina" with the Arabic word " <i>Madin</i> " in italics	Transcription error
216	25	Replace "3.175" with "3.75"	Transcription error
218	10	Replace "revealed" with "the prevailed"	Transcription error
218	22	Add "was" after "years" and replace "transaction and" with "transaction. And"	Transcription error
218	24	Replace "become" with "be coming"	Clarification
218	24	Add "that" after "bank"	Clarification
219	1	Replace "customers -- so must" with "customers. So it must"	Transcription error
219	3	Replace "details" with "details."	Transcription error
219	24	Add "Bank notes." after "Yeah."	Transcription error
220	11	Replace "generally" with "January"	Transcription error
223	10	Add "a" before "different"	Transcription error
223	10	Replace "the amount of" with "world in terms of"	Transcription error
223	17	Add "driven" after "cash"	Transcription error
223	22	Replace "go for" to "going through"	Transcription error
225	10	Replace "million" with "millions"	Transcription error
225	23	Replace "was to" with "also" and replace "cash just" with "cash. Just"	Transcription error
225	24	Add "only" after "cash"	Transcription error
225	24	Replace "title and deed" with "title deed"	Transcription error

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Page	Line(s)	Change	Reason
226	1	Replace "they go put this" with "he go and he deposit"	Transcription error
226	4	Add "or" after "change" and replace "houses use" with "assets using"	Transcription error
227	5	Replace "his" with "Aqeel"	Transcription error
227	11	Replace "where we" with "for me when I read it" and replace "reads" with "means"	Transcription error
228	17	Replace "visit" with "deposit" and replace "went to" with "wanted"	Transcription error
228	18	Replace "to move" with "belong"	Transcription error
228	24	Replace "visit" with ", busy"	Transcription error
229	5	Replace "could be -- could be" with "could be -- could slip"	Transcription error
229	8	Replace "repeat, especially" with "repeat this message"	Transcription error
229	14	Add "you" after "why"	Transcription error
229	15	Replace "no, why" with "you did no -- "	Transcription error
229	16	Replace "'24" with "twenty-four years ago"	Transcription error
229	17	Add "working in Saudi" after "things"	Transcription error
230	3	Add "for a bank" after "especially" and "with" after "Bank,"	Clarification
230	4	Replace "branches, you" with "branches. You"	Transcription error
230	8	Replace "big" with "mid"	Transcription error
230	17	Replace "differently" with "definitely"	Transcription error
230	17	Add "of" before "other"	Clarification
231	2	Replace "today" with "was so much used. Today"	Transcription error
231	5	Delete "more"	Transcription error
231	6	Replace "relying on" with "mobile and"	Transcription error
231	17	Replace "same as" with "service"	Transcription error
233	7	Add "balances" after "or"	Transcription error
234	7	Add "in Riyadh" after "is"	Transcription error
234	13	Replace "was" with "used"	Transcription error
234	21	Add "a lot of" after "have"	Transcription error
235	9	Replace "bigger" with "it is big"	Transcription error
235	11	Replace "bigger" with "big"	Transcription error
235	23	Replace "supports" with "is supposed"	Transcription error
236	25	Delete "would" and add "write" after "will"	Transcription error
237	3	Replace "at this -- and" with "either based on"	Transcription error
237	4	Delete "would"	Transcription error
237	8	Replace "In this case" with "At least"	Transcription error
239	23	Replace "branch" with "bank"	Clarification
240	3	Add "risk as" before "it" and delete "cash"	Transcription error
240	11	Replace "bank" with "banknotes"	Clarification
242	6	Replace "'22" with "2000"	Clarification
242	7	Replace "'21" with "2001"	Clarification
243	9	Replace "and" with "in" and replace "bank of course" with "bank's records"	Transcription error
244	7	Replace "can't" with "can"	Transcription error

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Page	Line(s)	Change	Reason
244	10	Replace "deposits, and" with "deposits. And"	Transcription error
244	11	Add "it doesn't have --" after "hasn't --"	Transcription error
244	12	Add "because" after "and"	Clarification
244	14	Replace "asking a" with "it's a big"	Transcription error
244	15	Replace "did it" with "dealt"	Transcription error
244	22	Replace "operate" with "are operated"	Transcription error
244	24	Replace "that" with "required"	Clarification
245	3	Delete "a"	Clarification
247	11	Replace "society" with "system"	Transcription error
247	12	Replace "at" with "and"	Transcription error
248	17	Replace "visit" with "deposit at"	Transcription error
248	18	Replace "visit" with "deposit at"	Transcription error
248	22	Replace "scarce" with "risky"	Transcription error
248	24	Replace "a number" with "remember"	Transcription error
249	1	Replace "whatever, whatever" with "whether, whether"	Transcription error
249	4	Add "VAT" after "have" and add "but" before "at"	Transcription error
249	7	Replace "we were" with "people"	Transcription error
249	8	Replace "collect" with "incorrect or"	Transcription error
249	13	Add "other" after "in"	Transcription error
250	15	Replace "wouldn't -- wouldn't" with "will -- will"	Transcription error
250	17	Replace "didn't" with "wouldn't"	Clarification
252	16	Replace "but" with "through"	Transcription error
253	13	Replace "didn't" with "don't"	Transcription error
253	19	Replace "and at" with "in, in"	Transcription error
253	21	Replace "office. We called" with "office, we called it,"	Transcription error
253	22	Replace "call it under" with "called it until"	Transcription error
254	4	Replace "and then" with "in individual"	Transcription error
255	16	Replace "have" with "had"	Transcription error
255	24	Replace "child" with "childhood"	Clarification
255	25	Replace "for" with "in"	Transcription error
257	12	Replace "nothing" with "he doesn't" and replace "didn't" with "don't"	Transcription error
257	13	Replace "realize this" with "need license"	Transcription error
257	16	Replace "realize this" with "need a license"	Transcription error
257	18	Add "collecting" after "you're not"	Transcription error
258	16	Replace "Mr. Curran" with "Witness"	Transcription error
258	16	Delete "Okay."	Transcription error
258	20	Replace "with -- with" with "whether -- whether it's"	Transcription error
258	21	Replace "weren't" with "went"	Transcription error
259	10	Replace "this" with "his"	Transcription error
260	19	Delete "charity"	Clarification
260	20	Delete "office"	Clarification
262	16	Add "general" after "some"	Transcription error
262	20	Replace "arranged" with "manage"	Transcription error
263	13	Delete "a"	Transcription error

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Page	Line(s)	Change	Reason
263	14	Replace "sponsor" with "sponsored"	Transcription error
265	6	Replace "didn't" with "don't"	Transcription error
268	5	Replace "L" with "Al"	Transcription error
269	4	Replace "1998" with "1988"	Transcription error
269	25	Replace "he" with "my father"	Clarification
270	24	Replace "board, Sharia" with "board members, Sharia"	Clarification
271	25	Replace "imam" with "I remember"	Transcription error
272	25	Replace "Yes" with "No"	Clarification
274	3	Add "charity" before "foundation"	Transcription error
276	5	Replace "understand" with "the answer"	Transcription error
276	13	Replace "and" with "you"	Transcription error
276	13	Replace "the" with "my father's"	Clarification
276	18	Add "Anyway," before "it's"	Transcription error
278	21	Add "their" after "was"	Transcription error
278	22	Replace "having an" with "al-Haramain"	Transcription error
278	23	Replace "opened and had been" with "open until being"	Transcription error
279	20	Replace "And another" with "Do we have the"	Transcription error
282	20	Replace "Jarbu" with "Jarbou"	Transcription error
283	5	Replace "We" with "Can we"	Transcription error
283	6	Replace "names." with "names, please?"	Transcription error
283	20	Replace "Whether" with "Well"	Transcription error
285	25	Replace "Hamad" with "Abdul Rahman"	Transcription error
286	8	Replace "one" with "money"	Transcription error
286	9	Replace "credit" with "paid"	Transcription error
286	15	Add "Abdul" after "Jeddah-based"	Transcription error
286	21	Add "Abdul" after "about"	Transcription error
287	17	Replace "letter" with names	Clarification
292	1	Replace "some" with "SAAR"	Transcription error
292	16	Add "or mid" after "early"	Transcription error
292	22	Replace "early" with "mid-"	Transcription error
292	22	Replace "--" with "until"	Transcription error
292	23	Replace "1990's" with "90's"	Transcription error
293	8	Replace "the" with "mid-"	Transcription error
293	15	Replace "gave you from" with "mentioned"	Transcription error
295	4	Replace "poetry {phonetic}" with "poultry"	Transcription error
295	10	Add "whether he was" after "confirm"	Transcription error
297	15	Replace "they" with "the"	Transcription error
297	16	Replace "make the" with "negative"	Transcription error
299	12	Delete "," after "Saar"	Transcription error
299	12	Add "Yaqub Mirza" after "people specifically"	Transcription error
299	16	Replace "and" with "in"	Transcription error
299	17	Replace "section" with "jurisdiction"	Transcription error
300	2	Replace "changing" with "change"	Transcription error

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Page	Line(s)	Change	Reason
300	18	Add "Mirza" after "Yaqub"	Transcription error
302	16	Replace "1990" with "199-"	Transcription error
302	17	Replace "what else has" with "whether it's" and replace "in discussion" with "is this question"	Transcription error
302	18	Replace "with the" with "whether" and replace "being" with "been"	Transcription error
302	21	Replace both instances of "being" with "been"	Transcription error
302	22	Replace "instead" with "an entity"	Transcription error
303	7	Replace "instead of" with "in this, in"	Transcription error
303	12	Replace "the potential" with "reputational"	Transcription error
305	20	Replace "is" with "I said" and replace "yeah, go to" with "Yaqub wanted"	Transcription error
305	22	Replace "this my father. He" with "that's what I said, my father, he"	Transcription error
305	24	Replace "quarterly" with "only"	Transcription error
305	25	Replace "suggested" with "suggestion"	Transcription error
306	2	Replace "the" with "any"	Transcription error
306	3	Delete "," after "reputation"	Transcription error
306	11	Add "know" after "you" and "all" before "the"	Transcription error
307	20	Delete "bin"	Transcription error
308	7	Replace "continued" with contributor"	Transcription error
308	8	Replace "show" with "issue"	Transcription error
308	9	Add "most of" after "believe"	Transcription error
308	10	Add "you show" after "unusual"	Transcription error
308	21	Replace "check" with "charity"	Transcription error
309	1	Add "in Islam" before "you"	Clarification
309	1	Replace "that" with "than"	Transcription error
309	7	Add "want" after "don't"	Transcription error
309	12	Replace "did" with "didn't"	Transcription error
313	14	Add "three" after "the"	Transcription error
314	9	Add "this the three name" before "without"	Transcription error
317	9	Replace "went" with "want"	Transcription error
317	11	Add "or read" after "speak"	Transcription error
317	16	Replace "under" with "and"	Transcription error
317	16	Replace "like" with "he'd reply to Yaqub"	Transcription error
318	3	Add "necessarily" after "not"	Transcription error
318	8	Replace "that" with "back" and replace "to" with "from"	Transcription error
319	10	Replace "arrange" with "arranging"	Transcription error
319	18	Add "Mirza" after "Yaqub"	Transcription error
321	7	Delete "Abdullah"	Transcription error
322	4	Replace "he receive" with "they received"	Transcription error
322	17	Replace "for" with "through"	Transcription error
322	25	Replace "That is" with "Can I See"	Transcription error
323	11	Delete "they're" after "without"	Transcription error

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Page	Line(s)	Change	Reason
323	16	Add “,” after “working”	Transcription error
324	15	Replace “...” with “are the people” and delete “it be”	Transcription error
324	17	Replace “of mind” with “management”	Transcription error
326	2	Delete “bin”	Transcription error
326	10	Replace “the checks with” “Sheikh Suleiman”	Transcription error
327	16	Replace “covered with” with “copy of”	Transcription error
327	16	Replace “Tell you” with “Ten”	Transcription error
327	17	Replace “I don’t know” with “in Arabic it’s not clear”	Transcription error
329	6	Add “help” after “endowment to”	Transcription error
330	20	Replace “money” with “body”	Transcription error
332	2	Replace “I don’t know what” with “people”	Transcription error
332	25	Add “if” after “but”	Transcription error
333	13	Replace “1990” with “99”	Transcription error
334	23	Replace “checks to charities” with “checks, charities”	Transcription error
335	7	Replace “different country” with “difficulty -- you know --”	Transcription error
335	18	Delete “to”	Transcription error
335	20	Add “your” after “over to”	Transcription error
337	14	Replace “didn’t” with “don’t”	Transcription error
338	18	Replace “can” with “did”	Transcription error
340	25	Replace “thing” with “think”	Transcription error
343	24	Replace “I saw that” with “That’s the right”	Transcription error
345	4	Delete “my company offices,”	Immediately corrected during testimony
346	2	Replace “the --” with “totally independent”	Transcription error
346	11	Add “the” after “sending”	Transcription error
346	15	Add “said” after “he”	Transcription error
350	19	Replace “the jumping off of” with “in the TV, when they jump, you know, from the”	Transcription error
350	20	Replace “and they” with “in the”	Transcription error
350	21	Replace “lost a lot” with “last part”	Transcription error
351	5	Replace “you go” with “he go”	Transcription error
351	19	Replace “either” with “you would,”	Transcription error
352	12	Replace “or met him” with “anytime”	Transcription error
354	4	Replace “Jazira” with “Jizan”	Transcription error
354	7	Replace “probably” with “robbery”	Transcription error
354	9	Add “of” after “two”	Transcription error
357	21	Replace “publically” with “publicly”	Transcription error
358	17	Replace “send” with “sent”	Transcription error
358	22	Replace “that we -- we are located” with “we -- we allocated”	Transcription error
358	25	Add “the” before “information”	Transcription error
360	15	Delete “good”	Transcription error
360	19	Replace “what the ease” with “White & Case”	Transcription error
365	12	Replace “this” with “the structure”	Transcription error

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Page	Line(s)	Change	Reason
366	2	Add "MR. CURRAN: Which Mr. Al Rajhi?" before "MR. CARTER:"	Transcription error
367	10	Replace "if they're saying for" with "he said imam of"	Transcription error
367	24	Add "if you look at" after "Because"	Transcription error
368	5	Add "is" after "he" and replace "Medina. The" with "Medina, the"	Transcription error
368	8	Add "and Sheikh Saleh Al-Hussayen" before "as ex-minister"	Transcription error
368	9	Delete "yeah"	Transcription error
369	22	Add "Right." before "Including"	Transcription error
370	15	Add ", right" after "SAMA"	Transcription error

ACKNOWLEDGEMENT OF DEPONENT

I, Abdullah bin Sulaiman Al Rajhi, do hereby certify the corrections and changes noted in this Errata to the transcript of my deposition on September 27, 2023 in the matter *In Re: Terrorist Attacks On September 11, 2001*, No. 03 MDL 1570 (S.D.N.Y.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 14, 2023



Abdullah bin Sulaiman Al Rajhi

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